



CACI's Standards of Ethics and Business Conduct

Dear Colleagues:

U.S. laws, rules, and regulations place an emphasis on appropriate business ethics, integrity, and corporate-governance. At CACI this is nothing new. Our long-standing philosophy has been, and always will be, to sustain the highest possible business ethics in the pursuit and performance of the Company's business.

Fundamental to CACI's commitment to high ethical standards is a corporate policy statement, issued and administered at the executive level, clearly delineating the company's philosophy, responsibilities and authorities for assuring compliance with the policy. Our goal and policy remains one of high ethics, being ever vigilant, doing top-notch work, being responsive to clients, and "QCS, BV" . . . quality client service, best value.

Being *Ever Vigilant* means something to us and to those we serve:

To *our customers*...it means we are committed to their success.

To *our employees*...it means we are never complacent.

To *our stockholders*...it means we deliver performance and accountability.

To *our culture*...it is who we are.

This document contains CACI's Standards of Ethics and Business Conduct and the basis of our ethical principles and practices for all of our business—government and commercial. It is consistent with all we have said and done in the past in terms of high ethical standards, and it applies to every CACI employee and consultant.

Since no one document can provide specific guidance for all situations encountered in daily business operations, CACI encourages employees to bring any questions regarding the interpretation of these Standards or concerns regarding compliance to the immediate attention of their supervisor or manager, or, if the employee prefers, to the Corporate Ombudsman or to the Legal Division. The CACI Hotline also is available 24 hours a day at 1-800-928-3505 to report confidentially potentially illegal, unauthorized, or inappropriate conduct. In addition, CACI has established the CACI Accounting Hotline at 1-866-839-8686, for employees to report suspected violations of corporate accounting policies, practices, or controls, or auditing policies and practices).

It is the obligation of every CACI employee and consultant to uphold the ethical principles and business practices stated in these Standards. It is the duty of every CACI employee and consultant to take responsibility for their actions. Good corporate leadership similarly demands manager oversight of employee execution and adherence to these Standards.

CACI is a quality-oriented company, with high ethical standards and business practices we can all be proud of. Let's keep it this way through continued vigilance and pride in our reputation.

Paul M. Cofoni

President and Chief Executive Officer

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Operational Philosophy

- 1. Our Commitment ... National Priorities**
America's missions are our missions. Since 1962, we have been driven by a company-wide commitment to support our country's highest priorities and to serve as a trusted national asset. As national missions evolve, CACI evolves with them. Ever vigilant, our people are ready to respond rapidly and efficiently with solutions that meet the challenges ahead.
- 2. Our Clients ... Number One**
At CACI, the client is Number One! We are a client service-oriented company. We are in business to provide quality services and solutions to our clients. Their needs are our opportunities. Our goal is complete client satisfaction. Once we have a client, our goal is to keep that client forever.
- 3. Our Quality ... Top-Notch**
At CACI, our motto is "Quality Client Service and Best Value" (QCS/BV). Our good name, our reputation, is paramount. We strive always to be top-notch ... quality is everything. We are the best-value company. We perform valuable project services and provide quality solutions. In everything we do, our goal is quality, excellence, and distinction.
- 4. Our People ... The Best**
At CACI, people are the most important asset. Our people bring distinction to all they do; they are the best. Our people are team players. They are flexible and can adapt quickly as business conditions and technology changes occur. They are fiercely proud of their company's remarkable legacy and their service to the nation. They are determined to succeed and refuse to fail.
- 5. Our Responsibilities ... Fully Accountable**
At CACI, we take full responsibility for the conduct of our business. We are fully accountable for what we do. Our published Standards of Ethics and Business Conduct defines our uncompromising policies on compliance with the laws

and regulations of the jurisdictions where we conduct business. We reward legitimate success and forgive understandable failure (no one is perfect!) ... but always with a focus on the next achievement.

6. **Our Productivity ... The Highest**

At CACI, high productivity is our constant goal. We are always competitive. We use time and resources efficiently and effectively to benefit our clients. We are creative, finding innovative solutions to meet client needs. We apply advanced technology to increase client capabilities. We develop cost-effective solutions to improve client services. We are problem solvers.

7. **Our Value ... The Bottom Line**

CACI remains dedicated to creating value for our clients, our shareholders, our employees, and our communities. We are committed to serving clients with quality, excellence, and distinction. Our shareholders are assured of long-term value. Our employees enjoy equal opportunity for growth, recognition, and reward. We are good corporate citizens who support and enhance the communities in which we do business. Value is the bottom line in everything we do.

CACI's Ten Business Values

1. ***Integrity***

Place integrity and honesty above all else.

2. ***Customer Commitment***

Put our clients first.

3. ***Customer Satisfaction***

Create value for clients and deliver quality.

4. ***Employee Advancement***

Provide career opportunities for our people.

5. ***Recognition***

Recognize and reward our top performers.

6. ***Friendly Corporate Culture***

Maintain a value-oriented culture where people enjoy working.

7. ***Growth***

Grow our business profitably and create long-term shareholder value.

8. ***Accountability***

Maintain accountability and responsibility for what we do...and if it's not right, fix it.

9. ***Respect***

Treat each other fairly, with mutual respect and with equal regard for our clients, business partners, vendors, suppliers, and the public at large.

10. ***Reputation for Excellence***

Work to sustain the highest-quality reputation for CACI and its people.

SECTION 1 - ABOUT THE STANDARDS

Responsibility/Accountability

These Standards of Ethics and Business Conduct (the "Standards") apply to all officers, employees, and consultants of every CACI company and business unit and to all business activities of CACI within CACI's U.S. operations.

We are all responsible for upholding our own reputation and that of CACI. You are responsible for ensuring that your own conduct, as well as the conduct of those who report to you and whom you observe, is honest and ethical at all times and complies not only with the law but also with our policies and these Standards. **Because our reputation for high ethical standards and quality work is so important, violations of any of these Standards or CACI policies will be the basis for disciplinary action, including but not limited to termination.**

It is your personal responsibility to read, understand, and comply with these Standards and to diligently comply with our other corporate policies and procedures. If you have any questions regarding specific policies, discuss them promptly with your immediate manager or higher-level manager. You may also contact Employee Relations or the Legal Division for clarification. You will be required to certify to your understanding of these Standards on an annual basis.

Administration and Interpretation

CACI's Director of Business Operations will administer these Standards.

Given the complexities of today's business environment, including government contracting and international business concerns, and the determination of CACI's Executive Officers and Board of Directors to comply with both the letter and spirit of all relevant laws and regulations, it is recognized that questions of interpretation will arise.

All questions relating to the charging of material and labor and to the allowability and reasonableness of overhead expenses should be directed to CACI's Chief Financial Officer or the Internal Audit Department.

All questions relating to CACI's Drug-Free Workplace Policy should be directed to Senior VP of Human Resources.

All other questions relating to these Standards and CACI's ethics and business practices in general should be directed to the Corporate Ombudsman, or the Legal Division.

Although questions of interpretation of these Standards may arise, the Company does not contemplate that it will grant any waiver of any of the terms of these Standards. Should extraordinary circumstances arise in which a waiver may be appropriate, however, such waiver may only be granted by the Board of Directors or the Audit Committee of the Board.

The Company's Obligation to Report Violations under the Federal Acquisition Regulation's Mandatory Disclosure Rules

Federal contracting requirements require, among other things, government contractors and subcontractors to monitor, identify, investigate and disclose, when detected, certain kinds of improper conduct relating to contract award, performance and closeout ("Mandatory Disclosure"). Specifically, the rules require CACI to provide written notice to the applicable agency's Inspector General with a copy to the relevant contracting officer if we have "credible evidence" of a violation of criminal laws relating to fraud, bribery, gratuities and conflicts of interest. In addition, "credible evidence" of a violation of the Civil False Claims Act relating to presentation of a false or fraudulent claim for payment and any significant contract overpayments also must be reported to the government under the Mandatory Disclosure rules.

It is long-standing policy for all CACI employees to conduct business with honesty and integrity, in compliance with applicable federal, state, and local laws and regulations. You are required to embrace CACI's commitment to ethical business practices and fully support CACI's compliance program.

How to Report Violations

We are committed to maintaining a workplace in which we all feel valued and fairly treated, and where all actions are in accordance with law, CACI policies, and these Standards. We provide many avenues through which employees can make complaints and/or bring attention to problems in the workplace. It is the responsibility of any employee or consultant having knowledge of any activity that is or may be in violation of these Standards, any law, rule, or regulation applicable to CACI's business, or any Affirmative Action Policy to promptly disclose such activity.

For this purpose, CACI has established the following potential contacts for reporting violations:

Immediate Manager

Corporate Ombudsman

Employee Relations Department

Legal Division

CACI Hotline 1-800-928-3505 (available 24 hours) - *This hotline is intended for reports of any kind of inappropriate conduct.*

CACI Accounting Hotline 1-866-839-8686 - *This hotline is intended for reports of concerns associated with accounting policies and practices, internal controls, and auditing policies and practices.*

Any complaint or report received will be taken seriously and handled as confidentially as possible consistent with investigating and resolving the matter. In conducting an investigation, CACI will make findings and take appropriate action to address any

improper conduct. Please help us maintain a workplace we all can be proud of by reporting such incidents.

Non-Retaliation

CACI is committed to providing a workplace conducive to open discussion of its business practices. It is CACI policy to comply with all applicable laws that protect employees against unlawful discrimination or retaliation in response to their lawfully reporting information alleging inappropriate conduct in the workplace.

However, employees who file reports or provide evidence which they know to be false or without a reasonable belief in the truth and accuracy of such information will not be protected by the policy statement above and may be subject to disciplinary action, including termination.

Investigation of Misconduct

CACI may use any lawful method of investigation which it deems necessary to determine whether any person has engaged in conduct which in its view is inappropriate or interferes with or adversely affects its business. Every employee and consultant is expected to cooperate fully with any investigation of any violation of law, CACI's policies, or these Standards.

SECTION 2 - LEGAL COMPLIANCE

CACI Workplace Environment

CACI is committed to identifying capable people to fill our workforce and providing them with opportunities to prosper without regard to their race, color, creed, religion, gender, age, national origin, citizenship status, sexual orientation, physical or mental disability, marital, or veteran status, or any other protected status.

Our policy is to provide a work environment free from all forms of discrimination and harassment, including sexual harassment. It is against CACI policy for any employee or consultant, male or female, to sexually harass another employee by (a) making unwelcome sexual advances, requests for sexual favors, or engaging in other verbal or physical conduct of a sexual nature, or (b) making submission to or rejection of such conduct the basis for employment decisions, or (c) creating an intimidating, hostile, or offensive working environment by such conduct. It is also against CACI policy to engage in behavior that constitutes harassment of any kind, whether such activity would be considered to be sexual harassment or otherwise.

CACI's Harassment Policy can be found in the Policy and Procedure Manual at Procedure 03.08.01.03 – Harassment, Sexual Harassment.

Our policy is also to provide CACI employees with a working environment free of the problems associated with the use and abuse of controlled substances or alcohol. The use of any controlled substance or alcohol is inconsistent with the behavior expected of our employees. Thus, CACI has implemented a "Drug-Free Workplace" policy which can be found in the Manual at Policy 03.08.04 – Drug-Free Workplace.

Timekeeping Policy

High ethical standards are demanded of every employee to ensure that CACI's timekeeping procedures are followed to the letter. You have a responsibility to accurately record your time on a daily basis, in accordance with CACI's official timekeeping policy and procedures. Upon being hired, you are trained on CACI's timekeeping policy and procedures which can be found in the Manual at Policy 04.01.01 – Timekeeping. Any question or doubt should be discussed with your immediate manager, or CACI's Government Compliance Group (703-841-7892). Any suspected violation should be reported to a CACI Ombudsman, or the Legal Division, or by contacting the 24-hour CACI hotline at 1-800-928-3505.

Interference with an Audit

You and persons acting under your supervision must refrain from taking any action that misleads, impedes or otherwise disrupts the work of either the Company's Internal Audit Department or its independent outside auditors, including any action to fraudulently induce, coerce, manipulate, hinder, or mislead any auditor in any respect.

Reporting Material Developments and Complying with Internal Controls

It is your duty to fully, fairly, accurately, timely and understandably report financial and non-financial information and developments that could possibly have a material effect on the operations or financial condition of CACI up-line through your chain of command and to the Company's Chief Financial Officer, the Corporate Controller, or the Legal Division as soon as it is discovered. In addition, it is your obligation to comply with our internal control policies and procedures and our disclosure controls and procedures. You are expected to report any failure to comply with such controls and procedures as described above, to the Company Ombudsman, the Internal Audit Department, or the CACI Accounting Hotline at 1-866-839-8686, which has been established specifically for employees to report suspected violations of corporate accounting policies, practices, or

controls, or auditing policies and practices.

Those employees engaged in preparation and filing of documents with the Securities and Exchange Commission and/or with public news releases or other public communications made by CACI are expected to fully, fairly, accurately, timely, and understandably disclose all information that is required in connection with such communications.

False Information and Employment

Employees shall not intentionally provide false or misleading information, or intentionally omit pertinent information regarding essential background, employment history, educational credentials, or other qualifications for employment. For example, CACI considers degrees obtained from institutions that are not properly accredited to be fraudulent. Such bogus academic credentials should not be reflected on any employee's resume or used as the basis to qualify for any position. The use of any such credential will expose the employee to discipline up to and including termination.

Fiduciary Duty of Employees

CACI's greatest assets are the knowledge, ingenuity, and productivity of its employees. We benefit most from such assets when employees perform their work with the highest degree of loyalty. In recognition of this fact, you have certain fiduciary responsibilities to the Company, including, for example, the duty to place the interest of CACI and its shareholders above your personal interest in any situation where they might conflict.

In light of the special trust and confidence that CACI places in its employees, these Standards require that you act with undivided loyalty to CACI and fairness in dealings with the Company, its employees, its suppliers, its business partners, and its existing and potential clients. The restrictions placed upon you are not intended to prevent you from competing lawfully and fairly with CACI following termination of employment (subject to the non-competition restrictions of the CACI Employee Agreement), or from engaging in subsequent employment in any field of your choice. Instead, they are intended solely to proscribe certain acts (including those listed below by way of example) that would be inconsistent with your legal obligations arising out of your employment relationship with the Company, such as:

Permitting the use of your name or resume by another entity in any bid, any response to a request for proposal, or any other similar application for a contract or task order that competes against the Company for new work; or is intended to replace, succeed, supersede, reduce, or diminish CACI's work under a contract or task order;

Taking kickbacks in exchange for entering into contracts;

Conducting or planning to begin a new, non-CACI enterprise while an employee of the Company and carrying out the enterprise or preparations for a new enterprise on Company time;

Working on behalf of another entity while a CACI employee;

Using trade secrets or confidential or proprietary information in an unauthorized manner;

Soliciting the Company's customers or employees; and

Taking opportunities that are discovered through the use of corporate property, information, or position for your own personal gain.

Conducting International Business

As CACI expands its international business, it is critical that CACI employees be mindful of complying with both U.S. laws and the foreign laws governing the place where CACI is conducting its international business activities, as well as import and export regulations relating to shipment of items and/or information. The broad principles expressed in these Standards apply to CACI's international business as well as domestic business that require performance abroad. In addition to other areas of potential concern, the following U.S. laws apply and must be strictly observed:

The Foreign Corrupt Practices Act (FCPA) prohibits directly, or through an agent or intermediary giving, offering, or promising of anything of value to foreign government officials to influence them to misuse their authority or exert an unfair business advantage. The FCPA also imposes civil liability on a company which does not keep accurate accounting records or knowingly fails to implement adequate accounting controls. Please contact your cognizant contract professional in CACI's Contracts Department if you have any questions regarding the payment to a foreign person or entity.

The Anti-Boycott Act (ABA) prohibits companies from participating in non-U.S. boycotts of countries friendly to the U.S. The ABA has particular application to dealing with Arab countries who may participate in a boycott of Israel.

Numerous Export Control laws and regulations apply to the export of materials, equipment, weapons, technology, data, software, information, and services ("items") to foreign governments, businesses, and individuals. Export controls may also

restrict the sale of items to U.S. companies abroad and foreign corporations in the U.S. A sampling of relevant laws include: Foreign Asset Control legislation, the U.S. Department of Defense's International Traffic in Arms Regulations, and the U.S. Department of Commerce's Export Administration Regulations. Prior to the transfer of any item outside of the United States or to a foreign company within the United States, consult your Business Group/Staff Function Export Point of Contact and the Legal Division for a full review of the matter in accordance with applicable export laws and requirements.

The restrictions on exports can also apply to what is called a "deemed export." A deemed export occurs where export controlled data or items are disclosed to foreign national employees who may work for CACI, a CACI teammate or client. If you have foreign nationals working on your project or with your customer, please take care to ensure that they are not exposed to restricted data or items.

SECTION 3 - COMPANY INFORMATION AND ASSETS

Use and Protection of Company Assets

You are responsible for the protection and appropriate, efficient use of CACI assets. CACI assets include physical assets as well as intellectual property and confidential information. All Company assets are to be used for legitimate business purposes only. Theft, careless, inappropriate or negligent use, or loss, of the Company's physical assets, as well as unauthorized disclosure or transfer in the case of CACI's intellectual property and confidential information, may subject you to disciplinary action up to and including termination. Where appropriate, CACI may refer information regarding any such action to law enforcement authorities.

Use of Software

Except for software supplied by a client, vendor or teaming partner pursuant to the terms of a contract, you shall use only Company licensed software. You should never accept third-party software without a written license governing its use. You shall use all software only in accordance with the terms of CACI's license agreements or other contracts under which the software is supplied. CACI licensed software may not be copied or provided to any third party unless authorized under CACI's license agreement. Before taking any action to transfer CACI licensed software, you should contact the CIS Department to determine whether your proposed action is permitted. Unauthorized use, copying, transfer or disclosure of software may subject the offender to disciplinary action and as well as civil and criminal penalties under copyright laws.

Protection of Intellectual Property, Trade Secrets, Confidential Information

It is essential for you to safe-guard CACI's trade secrets and confidential information and to refuse any improper access to trade secrets and confidential information of any other company or entity, including our competitors. CACI's proprietary information must not be discussed with others within CACI, except on a strict need-to-know basis. If there is a need to disclose CACI trade secrets or confidential information to any person outside CACI, it must be done only in conjunction with a disclosure agreement provided by the Contracts or Legal Division. Always be alert to avoid inadvertent disclosures which may arise in social conversations or in normal business relations and do not receive any such information from other companies or people except pursuant to written agreement. Similarly, CACI's property rights in its technology and products must be protected by use of appropriate agreements whenever such technology and/or products are used, transferred or disclosed. Contact the Contracts or Legal Division for an appropriate agreement.

Electronic Communications and Acceptable Use of Computer Resources

CACI policy regarding electronic communications and acceptable use of computer resources can be found in the Manual at Policy 09.06.02 – Electronic Communications & Acceptable Use of CACI IT Assets.

SECTION 4 - CONFLICTS OF INTEREST

Personal Conflicts of Interest

A "conflict of interest" occurs when a person's private interest (financial gain, career development, familial interest, reputation advantage, etc.) interferes in any way – or even appears to interfere – with the legitimate business interests of CACI. It is not practical to attempt to list all possible kinds of conflicts. Nonetheless, employees should be very conscious of the potential for their own interests, or those of their immediate family, to be in conflict with CACI's interests, and should take care not to act in a way that prefers those personal interests over CACI's interests or our customer's interest when they do conflict.

In order to avoid potential conflicts of interest, you should avoid any activity outside your Company work that is reasonably likely to put you in a conflict situation. For example, it is important to avoid engaging in activities outside of your CACI employment for entities that provide products or services that may be competitive with the products or services provided by CACI. If in doubt whether a situation or certain activity constitutes a conflict of interest, contact the Legal Division for guidance.

CACI's policies regarding Outside Employment and Employee Affiliations can be found in the Manual at Policy 03.01.04 – Outside Employment and Policy 02.02.06 – Employee Affiliations.

Insider Trading/ Tipping

Since CACI is a publicly-owned company, we have legal obligations to be especially vigilant in safeguarding material, non-public Company information from disclosure both inside and outside the Company. It is a violation of Federal law for anyone with knowledge of such information to buy or sell CACI stock, or to make any unauthorized disclosure of such information (known as "tipping"). Our policy is that CACI employees with knowledge of material information about the Company that has not been disclosed to the general public must refrain from disclosing such information to anyone else and from engaging in any transaction in CACI stock until the third business day following public disclosure of such information. Always contact the Legal Division when in doubt before conducting a transaction in CACI stock. As an aid to compliance, CACI has established periodic trading blackouts each quarter. Employees who receive e-mail notification of such blackouts are required to precisely comply with the requirements of the blackout.

Those insiders considered as "reporting persons" under the securities laws of the U.S. are also required to comply with the CACI policy regarding notice and reporting of all transactions in CACI stock. It is vitally important that such persons provide notice of any such trade to the Company's Legal Division and the Chief Financial Officer in time to allow timely filing of the required reports to the SEC (currently within 48 hours of the action).

Accepting Gifts, Gratuities, and Entertainment

Acceptance of gifts and gratuities from actual or would-be clients, suppliers, vendors, competitors or business partners can result in possible conflicts between your duty of loyalty to the Company and your personal interests. In order to ensure that such situations are considered thoughtfully, if you are offered a gift or gratuity with a value exceeding \$100, you must report such offer and seek approval to accept it through your up-line chain of command to the Chief Legal Officer.

In no event should you accept a gift where it would be prohibited by law or is known by you to be contrary to law or the corporate business practices of the company employing the person offering the gift.

CACI's policy regarding Gifts can be found in the Manual at Policy 02.01.02 – Gifts and Gratuities.

Providing Gifts, Gratuities and Entertainment

Due to the nature of CACI's business, the giving of gifts, gratuities or entertainment (considered "Business Courtesies") requires the use of good business judgment by employees and careful monitoring by managers. For commercial, non-government clients, Business Courtesies, including meals, entertainment, gifts, promotional items, services, and favors, may be extended, provided they are reasonable, not extravagant in value or number, infrequent enough not to become expected, and not offered in exchange for favorable consideration or treatment. A business courtesy is simply that—a courtesy—and should not be given if doing so would create even the appearance of an impropriety on CACI's part.

CACI's policy regarding Gifts can be found in the Manual as noted above.

Dealings with Suppliers, Vendors, Business Partners, and Competitors

Integrity and fair dealing are core components of our business practices. All vendors, suppliers, other business partners, and competitors should be treated fairly and uniformly in accordance with CACI's established purchasing policies and procedures. You must not engage in any activity prohibited under anti-trust laws, including boycotting, price-fixing, refusal to deal, price discrimination, or disparate treatment of suppliers. Paying bribes, accepting kickbacks, and obtaining and using third party insider information in dealings with suppliers, vendors and business partners are completely inappropriate and will not be tolerated.

SECTION 5 - INTERACTING WITH THE GOVERNMENT

Policies Relating to U.S. Government Contracting

As a government contractor, we have a special obligation to the U.S. Government, and to the general public, to ensure that we administer our contracts and deliver our products and services in a manner that fully satisfies both our legal obligations and our own high standards of integrity and quality.

Contracting with the U.S. Government imposes requirements not traditionally associated with purely commercial business transactions. We are committed to compliance with the letter and spirit of the laws and regulations governing U.S. Government contracting. Summarized below are a number of key requirements affecting U.S. Government contracts. Please contact your immediate manager, your cognizant Contracts professional or the Legal Division with any questions or concerns you may have regarding the following U.S. Government contracting policies and procedures.

False Claims/False Statements

It is a felony to knowingly make a false claim or false statement to the government. Violations of these and other statutes can subject the Company to damaging publicity, expensive and time-consuming investigations and litigation, reduction of negotiated contract rates, and the revocation of contracts. Both CACI and individual employees may also be subject to civil and criminal sanctions including fines, debarment or suspension, and prison sentences. Such violations also can expose an employee to discipline up to and including termination of employment.

Although it is not possible to specify here all contract-related dealings with the Government that present the risk of false statements, false claims, or other violations, particular attention is called to the following:

CACI is required to submit accounting and other records to the government as a basis for payment on existing contracts or as estimates on future work. All data must be accurate and all estimates must be made in good faith. It is our policy to charge all labor and material cost accurately, to the appropriate account, regardless of the status of the budget for that account. Improprieties, such as charging labor or material costs improperly or to the wrong account, charging direct contract effort to an overhead or indirect account, and falsification of time cards or other records will be grounds for disciplinary action including termination.

CACI is frequently required to submit cost or pricing data to the Government, and to certify that it is current, accurate, and complete. The definition of data that must be disclosed is very broad and includes facts as well as management decisions, estimates (based on verifiable data), and other information that a reasonable person would expect to affect the negotiations. Our policy is full disclosure of complete and accurate cost and pricing data that is current up to the date of agreement on price.

CACI submits proposals for reimbursement of indirect costs to the Government. A company official may be required to certify his belief that the proposal does not contain expressly unallowable costs such as for advertising, donations, entertainment, fines and penalties, lobbying, defense of fraud proceedings, and goodwill. It is our policy to request reimbursement only for those indirect costs that are reasonable in amount and for which we have a good faith belief that the costs are allowable.

We are often required to certify compliance with quality control specifications and testing requirements for our products or services. Our policy is to deliver goods and services that meet all contract requirements and give the customer the highest degree of confidence in our work. Improprieties, such as the failure to conduct required testing, or manipulation or falsification of test procedures or data, will not be tolerated.

Gifts and Gratuities to U.S. Government Officials

CACI employees must not offer, give, or promise to offer or give any money, gratuity or other thing of value to any government employee that such employee is prohibited from receiving by applicable law, including transportation, meals at business meetings, tickets to sporting or other events, or the like.

Even if applicable government regulations permit their acceptance, CACI employees must refrain from offering or giving or reimbursing expenses for any entertainment or offering any gratuity to any government employee who is personally and substantially involved in a procurement or administrative function relating to any contract for the direct or indirect purchase of products or services from the Company.

Federal government employees, as well as those of most state and local governments and many private companies, are subject to strict rules regarding the acceptance of gifts. CACI must respect these rules. In the government environment, the failure to do so may result in severe legal and financial consequences for both CACI and the offending employee. In addition, there are significant legal prohibitions associated with providing gratuities in the context of international activities. When in doubt regarding the appropriateness of a gift or extension of business courtesy, consult your immediate manager, your cognizant Contracts professional, or the Legal Division, and always err on the side of caution.

CACI's policy regarding Gifts can be found in the Manual as noted in Section 4 above.

Lobbying Activities

CACI is prohibited from using federal funds to pay persons such as lobbyists or consultants to influence or attempt to influence executive or legislative decision-making in connection with the award of any contract. We are also required to furnish a certification that no federal funds have been paid or will be paid in violation of this prohibition. In addition, CACI is required to report to the government any payments to any lobbyist or consultant paid with non-federal funds for such purposes.

Classified Information

Government information that is national security classified, procurement sensitive, or proprietary shall not be solicited or accepted from (or provided to) any source, either directly or indirectly, in circumstances where there is reason to believe that the release is not authorized.

All classified information in CACI's possession shall be treated in strict compliance with U.S. Government mandated procedures for such classified information.

Prohibited Use of Source Selection Information/Competing Contractor Cost and Pricing Information

CACI must be particularly concerned with obtaining sensitive procurement information from federal government agencies. During the conduct of any procurement action, CACI will not solicit or accept from any officer or employee of the agency, or any other source, any proprietary or source selection information regarding that procurement. This prohibition begins with the development, preparation, and issuance of a solicitation and concludes with award of a contract, a contract modification or extension. As used herein, proprietary data includes information contained in a bid or proposal, cost or pricing data, and any information submitted to the Government by a contractor and properly designated as proprietary. Source selection information includes information designated as government sensitive such as listings of offerors and prices, listings of bidders prior to bid opening, source selection plans, technical evaluations of proposals, competitive range determinations, rankings (except for sealed bidding), source selection board reports and evaluations, source selection advisory board recommendations, and other information determined by the head of the agency or contracting officer to be information which would jeopardize the integrity or successful completion of the procurement if disclosed.

Hiring of Government and Former Government Employees

Special concerns apply to hiring or retaining a government or former government employee as an employee or consultant of CACI. In addition, there are special constraints regarding any communication concerning possible employment of government employees who are designated as "procurement officials" during the conduct of any procurement action and otherwise. **You shall not conduct any discussions regarding, or make any offer or promise of, future employment or business opportunity to any procurement official during the conduct of any procurement.** In order to be sure that you do not run afoul of restrictions in this area, before discussing potential CACI employment with any government employee, contact a representative of the Legal Division for advice.

CACI's specific hiring policy affecting clients and government or former government employees can be found in the Manual at Procedure 03.02.01.03 – Hiring Government or Client Personnel. **There are no exceptions to this policy.** Authorization from the Chief Legal Officer must be obtained before even mentioning proposed employment to current government employees, and then only after they have publicly announced that they are leaving government service. In addition, any plans to employ retired military officers of general or flag rank, or civilian officials having the rank of Deputy Assistant Secretary or above, must be approved by the Chief Executive Officer of CACI International Inc, prior to an offer of CACI employment.

Prohibited Contractual Relationships

CACI shall not **knowingly** employ an individual nor contract with a company, by any means, if the individual or company is on the General Services Administration's (GSA) Consolidated List of Debarred, Suspended, and Ineligible Contractors, nor knowingly employ an individual who has been convicted of an offense related to government contracting.

Nor will CACI knowingly contract with an individual or entity identified on the Office of Foreign Asset Control's (OFAC's) "Specifically Designated" list of nationals or persons who are subject to trade restrictions.

CACI employees will immediately sever all business connection with any former employee or consultant of CACI whose conduct violates applicable laws, regulations, or basic tenets of business integrity and honesty, and such other individuals specifically identified by the Company.

Avoidance of Restrictions on Trade

CACI will not enter into a subcontract or teaming agreement that unreasonably restricts sales by the other company directly to the U.S. Government of items made or supplied by the other company and will not otherwise act to restrict unreasonably the ability of any other company to sell directly to the U.S. Government. Conversely, CACI will not enter into agreements where, as a subcontractor or teaming partner, we are subject to any unreasonable restriction to sell our products or services directly to the U.S. Government.

Consultant Compliance with Standards

Consultants shall be required by contract to comply with all laws and regulations relating to U.S. government contracting. These Standards shall be incorporated in all consultant contracts, and each such contract shall expressly provide for termination in the event the consultant violates the laws or regulations relating to government contracting, CACI Policies, or these Standards.

Drug-Free Workplace Act Compliance

CACI fully complies with The Drug-Free Workplace Act of 1988, which was enacted with objectives of achieving a drug-free America and combating illegal drugs in the workplace. Among the Act's requirements is a provision that any contractor seeking

a single federal government contract of \$25,000 or more, will certify that the Company has a drug-free workplace policy, and, as a minimum, has instituted programs prescribed by law. In addition, DoD has a Drug-Free Work Force Regulation that specifies, along with other requirements, that all defense contractors institute and maintain certain programs to achieve a drug-free work force.

The policies and procedures adopted by CACI can be found in the Manual at Policy 03.08.04 – Drug-Free Workplace.

Government Furnished Property

You are responsible for the appropriate use, maintenance, accounting for, and, when necessary, disposal of government property in compliance with government mandated policies and procedures.

Company documents you also should be familiar with for ethics compliance:

CACI's Policy & Procedure Manual
CACI's Policy 03.08.01 – Diversity and Equal Opportunity Employment
CACI's Procedure 02.02.01.01 – Reporting Compliance Issues
CACI's Policy 09.06.02 – Electronic Communications & Acceptable Use of CACI IT Assets
CACI's Procedure 03.08.01.03 – Harassment, Sexual Harassment
CACI's Policy 03.08.04 – Drug-Free Workplace
CACI's Policy 04.01.01 – Timekeeping

You may access these documents online in the CACI Policy & Procedure Manual.