

ASci's CONFLICT OF INTEREST PLAN

A. Corporate Structure

ASci Corporation is a high technology consulting and engineering company. ASci's corporate headquarters are located at 6728 Curran Street, Second Floor, McLean, Virginia 22101, telephone (703) 847-0000. ASci's Administrative Headquarters is located at 2880 Capital Medical Boulevard, Suite One, Tallahassee, FL 32308. Currently, ASci is working on projects throughout the United States. Work locations include Columbia, Missouri; Duluth, Minnesota; Gainesville, Florida; New Orleans, Louisiana; Rochester Hills, Michigan; and Vicksburg, Mississippi.

ASci provides a broad range of services to industry and government. Its major areas of service are:

- Technology, Health and Environmental Assessment
- Computer Sciences - Systems Engineering
- Management, Planning, and Logistics

B. Searching and Identifying Conflict of Interest (COI)

As defined in the Federal Acquisition Regulation, organizational conflict of interest means that because of other activities or relationships with other persons, a person is unable or potentially unable to render impartial assistance or advice to the Government, or the person's objectivity in performing the contract work is or might be otherwise impaired, or the person has an unfair competitive advantage. ASci will require that a search be conducted to determine whether any such unfair advantage exists prior to commencing work on any potential contract.

In order to determine whether or not a COI exists, ASci will perform a detailed search of its Project Database, which is fully discussed in the next section. When new contracts and task orders are issued, the database will be searched to identify any relationships with the topic, location or personnel anticipated to perform on the new task.

An example of such a conflict of interest would exist if an ASci employee were doing work for the Government which involved rating the work of other ASci employees.

Conflict of interest may also occur in performance of management support services, consultant or other professional services, contractor performance of or assistance in technical evaluations or systems engineering and technical direction work performed by ASci that does not have overall contractual responsibility for development or production. Organizational Conflict of Interest may result when factors create actual or potential Conflict of Interest on an instant contract, or when the nature of the work to be performed on the instant contract creates an actual or potential conflict of interest on a future acquisition.

Another example of Conflict of Interest may occur if a company agrees to provide systems engineering and technical direction for the Navy on the power plant for a group of submarines (i.e. turbines, driveshafts, propellers, etc.). Then that same company should not be allowed to supply any power plant components.

If ASci receives a contract to prepare a detailed plan for scientific and technical training of personnel, then ASci may not be awarded a contract to conduct the training.

C. Data Base

In order to determine whether a COI exists, ASci has constructed and maintains a data base which contains the following information and capabilities: (1) a list of past sites ASci has worked on; (2) a list of any subsites where ASci employees work or have worked; (3) a list of ASci's past and current commercial and public clients; (4) a memo field corresponding to each contract and work assignment listed above which indicates the type of work that was performed and (5) a keyword field which will give further classification of the type of work performed. ASci is currently supplementing its data base with information pertaining to the dollar value of work performed. It is possible to search and retrieve information from the database. Any new work received by ASci will be promptly added to the database. In connection with the database, new data will be indexed so that the database can be sorted in accordance with the various fields in the database. ASci's database contains all contract data covered by the company's records.

D. Personal Certification

ASci's COI Plan requires all employees of ASci to sign a certification when they are hired. The certification requires that the employee agree to report to the proper authority as identified by ASci, any personal COI that the employee may have on any work that may result in an actual, apparent, or potential COI. The ASci COI Plan certifies that each individual employee has received and understands the company's Conflict of Interest plan and procedures. The certification for each employee is retained by ASci. As well as obtaining personal certifications upon their hire, ASci employees also complete annual certifications that are collected and retained at ASci headquarters.

E. Work Assignment (WA), Technical Direction Document (TDD) or Delivery Order (DO) Notification and Certification

Upon receipt of issued task assignments, ASci performs a search of its database to determine whether or not conflicts exist. If the contract does not include an annual certification requirement, ASci will notify the Agency of any conflict with a written certification within 20 days of receipt of the WA/TDD/TO. ASci will also require employee certification that no COI exists with the work that they perform.

F. Annual Certification

If WA/TDD/TO certification is not required, ASci will require submission annually that the employee certifies that no COI exists for the work that employee is doing for the Government. ASci Site Managers will annually conduct refresher COI Plan reviews and/or collect personal certifications from all employees and submit them to ASci headquarters.

G. Notification and Documentation

According to the COI Plan, Mr. Rehan Haque, the company president, will determine that no Conflict of Interest exists for a particular piece of work to be performed. If it is found that a conflict exists, ASci will notify the client in writing and by phone that this is the case. ASci will take steps to avoid or mitigate any Conflict of Interest. ASci will document all COI searches related to EPA work – whether or not an actual or potential COI has been identified.

H. Training

ASci requires that, upon hiring, all employees receive basic Conflict of Interest training and that they receive Conflict of Interest awareness training annually. ASci's Conflict of Interest plan will be available for all employees to review. Annual awareness training will include at a minimum, a review of the certification language and any changes that may have occurred in ASci's Conflict of Interest plan. Also, ASci will routinely disseminate current Conflict of Interest information to its employees.

I. Subcontractor's COI Plans

ASci will monitor its subcontractors to ensure that all subcontractors are complying with the COI provisions in their contracts. To facilitate the monitoring process, ASci will require either WA/TDD/DO certification (when subcontract tasks are issued) or annual certifications in writing.