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Our corporate philosophy stipulates that we utilize and uphold the principles of honesty, integrity, fairness, ethics and common sense. It is to these principles that we endeavor to adhere in testing for all clients. In this statement we shall identify any unique circumstances associated with the testing of voting systems.

- This policy applies to everyone at iBeta Quality Assurance. Anyone violating this statement will be subject to discipline, which may include dismissal.
- Everyone has a duty to report violations or other potentially unethical behavior by anyone, including owners, directors, employees, clients, subcontractors, etc. to the Quality Manager.
- No one has the authority to direct, approve, or tolerate any violation by anyone.
- Anyone who has questions about the statement should consult with the Quality Manager.

## General Test Service

In testing for our clients we commit to operate in an efficient, intelligent, and productive manner to facilitate their goals and deadlines. This includes providing

- Qualified test staff;
- Test methods and test plans specifically suited for reaching project goals;
- Frequent and appropriate feedback to clients of project status and progress to goals.

## Contracts

Our contracts shall detail services to be provided and deliverables. We include our commitment to operate in an efficient, intelligent, and productive manner in the form of a customer satisfaction guarantee.

## VSTL Test Services


### Compliance with the EAC

Accreditation to test voting systems for EAC certification is granted by the Election Assistance Commission (EAC). Voting System Testing accreditation is granted by the National Voluntary Laboratory Accreditation Program (NVLAP). We commit to adherence to the requirements and rules they establish in their standards, manuals and policies.

### VSTL Contracts

Contracts for the testing of voting systems shall stipulate:

- We are accredited for testing of voting systems by the EAC:
  - All test planning, execution and reporting is subject to EAC requirements and rules. These include:
    - Defining the scope of testing;
    - Delivery of the Test Plan to the EAC, for approval;
    - Delivery of changes to the Test Plan to the EAC, as testing proceeds;
    - Independent notification to the EAC of test anomalies or failures during testing;
    - Responding to queries regarding the voting system by the EAC or EAC Reviewer;
    - Documentation of test anomalies, failures and resolutions are incorporated into the report.
    - Delivery of the Test Report to the EAC occurs when all tests have been successfully completed;
    - The manufacturer is responsible to ensure the report is consistent with the EAC requirements and rules;
    - The EAC is the Decision Authority for granting or denying certification; and
    - Digitally signed source code, pre and post build environments, installation devices and trusted build are transferred to the EAC approved repository.
  - Only testing submitted to the EAC can bear the EAC logo.
- In testing voting systems we are an independent test lab. In this capacity we can test, review and evaluate if the voting system meets the test standard and performs to the manufacturer's specification. In doing this we cannot:
  - Certify a voting system.
  - Guarantee that a voting system will meet the standards;
  - Guarantee that a voting system will be recommended for certification;

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- Guarantee that a voting system recommended for certification will be accepted;
- Specify the design of a voting system; or
- Instruct the method to resolve issues.

### **VSTL Personnel Restrictions**

iBeta employees working on a VSTL projects shall not have been convicted of a felony offense or any criminal offense involving fraud under wither Federal or state law.

### **Conflicts of Interest**

As many of iBeta's clients are direct competitors, employees shall neither use nor communicate, internally or externally, information regarding the products under test or information obtained from companies in engineering disclosure meetings. All employees shall maintain the confidentiality and security of all systems under test.

### **VSTL Conflicts of Interest**

No iBeta owner, or staff involved with the testing of voting systems, their spouse or minor child may have a financial interest or connection with a company that manufactures voting systems. No employee may be involved in: both the development and testing of a voting system or system component; or otherwise provide consultation or other services to a voting system developer that would compromise the independence of the testing of a voting system or system component.

### **Company, Owner and Voting Program Managers**

The owners of iBeta and Voting Program Managers shall complete and sign a VSTL Disclosure confirming that they have no VSTL Conflicts of Interest and shall refrain from public support or making contributions to any candidate, political committee, or campaign. The VSTL Disclosure shall identify any other possible conflicts such as past/current connections with election officials, elected officials, candidates, past work with voting related entities, political donations, etc. This information will be provided to the EAC.

### **VSTL Tester Personal Disclosures**

Employees who actively perform VSTL work are required to complete and sign a VSTL Disclosure confirming they have not been convicted of a felony offense or criminal offense involving fraud under either Federal or state law and have no VSTL Conflicts of Interest. In addition they shall provide a written disclosure of other possible conflicts such as connections with election officials, elected officials, candidates, past work with voting related entities, political donations, etc. These disclosures will be individually assessed by iBeta management as to whether there appears to be a conflict of interest. Independent testing does not mean that testers have no personal opinions; it means that they can approach testing without bias. If warranted iBeta management may seek guidance from the EAC.

### **Acceptance of Other Voting, Election or Work for Political Entities**


Testing of voting systems is a multi-tiered process, including federal, state and local government entities. iBeta does not deem state or local government work a conflict if the work is to new requirements and not a review of our prior work or the work of our competitors. Post election forensic work focused on the functionality of a voting system, for the purpose of reviewing our prior work or the work of our competitor, will not be accepted. Post election forensic work on behalf of a partisan candidate will not be accepted. Other election, voting or work for political entities that falls outside these parameters shall be judged on a case by case basis. If iBeta assesses the work is not a conflict and enters negotiations with election, voting, or political entities, a disclosure will be immediately submitted to the EAC.

### **Employee Political Participation**

iBeta neither encourages nor discourages private participation of employees in the political process. Any views that they express should be identified as personal and not representing iBeta.

### **Meals and Gifts**

All employees may partake of beverages, lunches or snacks that are provided for free to all participants in an on-site meeting or working lunch. Offers of refreshments to accrediting auditors or entities from accrediting organizations shall be extended within the same parameters.

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Employees assigned to non-VSTL test projects may accept thank you meals, gifts, or productivity incentives from clients. Such meals, gifts, or incentives should be brought to the attention of the project manager or QA Director.

Employees are instructed not to accept meals or gifts from VSTL clients. In the event that a gift is mistakenly received, disposition of the gift shall be guided by Standards of Ethical Conduct for Employees of the Executive Branch, Gifts from Outside Sources (5 C.F.R. Part 2635 Subpart B). Employees may not receive productivity incentives from VSTL clients. iBeta may compensate employees for working in excess of 40 hours/week on VSTL projects. Offers shall be disclosed to the QA Director if the VSTL client is insistent or persistent.

Executives, sales personnel, and managers may purchase gifts or meals for clients to support marketing efforts. All expenses are approved by the CFO. Any employee may offer refreshments to any client personnel.

**Travel Expenses**

Reimbursement of expenses for on-site testing or other purposes shall be identified in the contract. Contracts for VSTL clients shall specify per diem for meals and incidentals. Hotel and transportation expenses shall be charged at actual cost.

In paying for travel expenses for accrediting auditors or entities from accrediting bodies, iBeta shall follow the rules of the accrediting organization.

**Release of Client Information**

No client information is released to any entity without the written authorization of the client.

**Comment on VSTL Information**

All calls from news media will be directed to the QA Director – Voting. Comments to news organizations, public forums, and symposiums shall be limited to the general issues regarding testing of voting systems. No comments shall be made regarding specific client tests or testing by other entities. Questions relating to publicly available information may be answered by directing the questioner to the location of the information.

**State and Local Official Requests for VSTL Information**

All calls from state or local officials will be accepted or returned by the QA Director – Voting. If the client has not previously authorized iBeta to speak with an official, then the client will be contacted to confirm their authorization before answering questions regarding a report or non-publicly available information. If the client refuses authorization, the official will be advised of this in writing and referred to the EAC for further information regarding their provisions for the release of information under the Freedom of Information Act.

(See the iBeta Quality Assurance Employee Handbook for policies related to employment, health & safety and drugs & alcohol.)