

MALPRACTICE PREVENTION PROGRAM

North Wind Systems LLC is committed to the prevention of malpractice and fraud. It is the responsibility of each North Wind Systems employee, our suppliers and sub-tier suppliers to be aware that Malpractice and Fraud & Falsification are grave and serious matters. Some examples of Malpractice and Fraud & Falsification are as follows:

- Issuing a procedure or instructions known to contain unauthorized deviations to contractual requirements
- Knowingly waiving or eliminating a contractual requirement without authority to do so
- Deliberately accepting unsatisfactory work
- Intentionally performing unacceptable work
- Failing to report problems or unsatisfactory conditions in one's own workmanship
- Verifying by signature that an action was taken, knowing in fact the action was not taken, or not performing the required checks or verifications to assure the action was taken
- Verifying performance based on hearsay, not personal observation
- Tampering with calibrated instruments to avoid rejection of work
- Falsifying dates on records to comply with frequency or deadline requirements
- Falsifying data to cover-up a procedure or drawing deviation
- Falsifying data to have work accepted, thereby avoiding further work or rework
- Concealing or not reporting information on malpractice, fraud, or falsification known to have been committed by others

Consequences of Malpractice and Fraud & Falsification could involve functional failure of product in operation on land, air or sea, causing loss of equipment and life. Consequences also include severe dollar loss to North Wind Systems, our customer and the Government. Acts of malpractice or fraud and falsification will be subject to federal criminal prosecution for violation of law under Title 18 of the U.S. Code, Chapter 47, Section 1001.

It is the responsibility of all parties to avoid the slightest possibility or appearance of impropriety or malpractice and to report known or suspected occurrences anonymously or in person to North Wind Systems Management or the proper authorities.