asoa | INVESTMENTS™

DOING THINGS RIGHT

Compliance & Integrity Guidelines

A public standard for responsible prospecting, bidding, delivery, and use of AI across DoD, VA, federal, state, and local government markets.

VERSION	EFFECTIVE	APPLIES TO
1.1	October 6, 2026	All ASOA Companies

SOLUTIONS TODAY. STRONGER TOMORROW.

ASOA Investments LLC | SBA-Certified SDVOSB

01 / OUR COMMITMENT

A standard that applies before the first conversation.

ASOA earns trust by being truthful, prepared, fair, and accountable. Compliance begins during market research and prospecting; it continues through teaming, bidding, performance, invoicing, closeout, and record retention.

OUR COMMITMENT We compete on capability and value. We do not trade integrity for speed, access, revenue, or an award. When a requirement is unclear, ASOA pauses, verifies, documents, and asks the proper authority.

Who and what these guidelines cover

- ASOA Companies means ASOA Investments LLC and every entity it controls now or later.
- The guidelines apply to directors, officers, employees, consultants, temporary personnel, agents, lobbyists, subcontractors, and teaming partners when they represent ASOA or support ASOA work.
- They cover DoD, Department of Veterans Affairs (VA), other federal agencies, state governments, counties, municipalities, authorities, public schools, and other public bodies.
- The solicitation, contract, grant, purchase order, agency supplement, and jurisdiction-specific law always control when they impose a stricter requirement.

How to use this public edition

This document states ASOA's minimum expectations and the controls that public buyers and partners can expect. Internal procedures, system configurations, investigation files, and privileged legal guidance remain controlled. Each opportunity receives a separate clause and jurisdiction review.

IMPORTANT This is a management and ethics standard, not legal advice or a representation that every listed rule applies to every procurement. ASOA verifies the current solicitation, contract clauses, and governing law before acting.

Seven principles. Clear accountability.

ASOA SEVEN™ turns the commitment to Doing Things Right into repeatable behavior.

01	**Tell the truth**	Represent qualifications, ownership, status, experience, pricing, and performance accurately. Distinguish individual prior-role experience from ASOA contract past performance.
02	**Protect the process**	Do not seek, use, or disclose source-selection, contractor bid/proposal, procurement-sensitive, classified, controlled, proprietary, or personal information without authorization.
03	**Reject improper influence**	No bribes, kickbacks, gratuities, hidden referral fees, or gifts intended to influence an official action. Follow the strictest applicable gift and lobbying rule.
04	**Surface conflicts**	Disclose personal, financial, organizational, and impaired-objectivity conflicts early; mitigate or decline the work when they cannot be resolved.
05	**Protect people and data**	Use least access, approved systems, need-to-know handling, and contract-specific safeguards for government, client, employee, and partner information.
06	**Keep reliable records**	Maintain accurate time, cost, decision, approval, subcontract, deliverable, and communication records. Never backdate, conceal, or alter a material record.
07	**Speak up and correct**	Pause questionable activity, report concerns promptly, preserve evidence, cooperate with reviews, and correct confirmed issues without retaliation.

Accountability

- The Founder & CEO sponsors the program, sets the tone, provides resources, and receives material escalations.
- A Compliance Lead is designated in writing and maintains the policy, training, review records, issue log, and corrective-action tracking.
- Opportunity Leads own the compliance checklist for each pursuit. No proposal is submitted without documented human approval.
- Every person has stop-work authority when they reasonably believe conduct could violate law, contract, security, safety, or these guidelines.

The ASOA SEVEN™ compliance gates.

The gates apply from the first lead through contract closeout. A gate is evidence of readiness, not a paperwork exercise.

GATE	CONTROL	QUESTION	MINIMUM EVIDENCE
1	**QUALIFY**	Source and fit	Use authoritative notices; identify buyer, vehicle, scope, NAICS/PSC, place of performance, due date, and acquisition stage.
2	**VERIFY**	Eligibility and status	Confirm active registrations, size and certification status, licenses, exclusions, representations, and solicitation-specific eligibility.
3	**PROTECT**	Integrity and information	Screen conflicts, procurement-integrity risk, data types, CUI/classification, privacy, export, AI, and system-access requirements.
4	**PRICE**	Truthful and supportable offer	Use current assumptions, authorized labor/categories, documented estimates, and accurate cost or pricing data when required.
5	**APPROVE**	Human decision	Obtain named review of technical, pricing, certifications, representations, subcontracting, security, and submission authority.
6	**PERFORM**	Deliver and monitor	Kick off obligations, flow down clauses, train the team, control changes, track milestones, and escalate variance early.
7	**RETAIN**	Evidence and learning	Retain the solicitation, bid, approvals, contract, modifications, deliverables, invoices, communications, incidents, and closeout lessons.

NO-GO RULE

Do not bid, certify, promise, upload, or begin work while a material compliance gap is unresolved. Record the owner, corrective action, deadline, and approval before proceeding.

One standard. Market-specific checks.

ASOA uses the same integrity standard everywhere, then adds the rules of the agency and jurisdiction.

MARKET	BEFORE PROSPECTING OR BIDDING	CONTRACT-SPECIFIC REVIEW
DoD	Confirm SAM status and opportunity source; identify requiring activity and acquisition channel; protect nonpublic information; avoid contact that could compromise procurement integrity.	FAR/DFARS clauses; CUI and covered defense information; NIST SP 800-171/assessment and CMMC status only when required; incident reporting; PIEE/SPRS access; export/classification; supply-chain and subcontract flow-downs.
VA	Confirm SAM and SBA VetCert status; validate the set-aside and size standard; use VA forecasts, notices, and approved outreach channels.	FAR/VAAR; Veterans First requirements when applicable; limitations on subcontracting; key personnel; privacy, records, system access, healthcare or sensitive-data terms; subcontract flow-downs.
Other federal	Use SAM.gov and official agency forecasts/notices; verify registration, exclusions, size, reps/certs, and agency contact rules.	FAR and agency supplement; ethics/disclosure; OCI; labor standards; cybersecurity/privacy; domestic preference; Section 508/accessibility; records, audit, and subcontract requirements as included.
State	Register with the state procurement portal; verify entity/tax status, certifications, licensing, lobbyist/vendor communication rules, and public-records exposure.	State procurement code and ethics; campaign/gift restrictions; insurance; prevailing wage; privacy/breach notice; records retention; open records; accessibility; MWBE/DBE goals; indemnity and governing law.
Local	Use the issuing county, city, authority, school, or utility portal; confirm vendor registration, local preference and outreach rules, permits, licenses, and bid format.	Local code and ethics; conflicts and gifts; public records; prevailing wage; insurance/bonds; local DBE/MWBE goals; background checks; data/security; invoice and acceptance requirements.

BLIND SPOT

State and local procurement is not one rulebook. The issuing jurisdiction's code, solicitation, incorporated terms, and funding source must be checked every time. Federally funded state/local work may also carry federal requirements.

AI assists. Accountable people decide.

ASOA uses AI to improve research, organization, analysis, and drafting. AI does not replace professional judgment, source verification, security controls, or authorized human approval.

RULE	ASOA REQUIREMENT
Approved purpose	Define the mission need, intended user, decision supported, data required, benefit, harm, and accountable owner before use.
Data boundary	Do not enter classified information, CUI, source-selection or contractor bid/proposal information, export-controlled data, credentials, protected personal information, health information, client-confidential data, or third-party proprietary content into an AI service unless the contract, data owner, security plan, and approved system expressly allow it.
Human review	A qualified person verifies facts, calculations, citations, tone, bias, privacy, intellectual-property risk, and contract compliance before use or release.
Reserved decisions	AI may not independently approve certifications, representations, pricing, invoices, claims, hiring, discipline, security determinations, teaming commitments, proposal submission, or acceptance of contract terms.
Transparency	Disclose AI use when required by law, solicitation, contract, client instruction, or professional standard. Never present generated material as verified evidence when it is not.
Traceability	Record material inputs, sources, model/tool, reviewer, edits, approval, and released version when AI meaningfully contributes to a client or proposal deliverable.
Monitoring	Test outputs and controls proportionate to risk. Correct or stop use when quality, security, fairness, or compliance is not acceptable.

CONTROL BASELINE

ASOA uses the NIST AI Risk Management Framework as a voluntary governance reference. Contract clauses, agency policy, system authorization, privacy law, and security requirements remain controlling.

Compliance travels with the work.

ASOA remains responsible for commitments made in its name. Partners are selected for capability, integrity, readiness, and transparency—not merely access to an opportunity.

Teaming and subcontracting	Accurate performance and billing
• Confirm identity, ownership, exclusions, responsibility, licensing, conflicts, past performance, cyber readiness, and ability to deliver. • Use written agreements defining scope, roles, intellectual property, data handling, communications, pricing, records, audit rights, incident notice, and applicable flow-down clauses. • Do not use a partner to evade eligibility, limitations on subcontracting, affiliation, size, or certification rules. No paper-prime arrangements. • Monitor performance and document corrective action.	• Charge only allowable, allocable, reasonable, authorized, and supported costs when those standards apply. • Record time to the correct project and task; never shift cost to conceal an overrun or make another project appear favorable. • Invoice only accepted or properly billable work; retain supporting records. • Do not substitute key personnel, change scope, promise extras, or direct out-of-scope work without documented authority. • Promptly identify performance, quality, security, safety, schedule, and budget risks.

Training expectations

- Orientation before representing ASOA or accessing controlled systems or information.
- Annual ethics, conflicts, information protection, cybersecurity, records, reporting, and role-specific contracting training.
- Opportunity-specific briefings for procurement communications, data restrictions, security, labor, safety, key personnel, and clause flow-downs.
- ASOA SEVEN™ Contractor Training uses the seven compliance gates as the repeatable learning and approval structure.

EVIDENCE Completion records, acknowledgments, exceptions, approvals, and corrective actions are retained according to contract, legal, and ASOA schedules.

07 / SPEAK UP

Raise concerns early. Protect people who report.

Anyone supporting ASOA is expected to ask questions and report suspected misconduct, control failures, security incidents, inaccurate statements, or pressure to bypass a requirement.

Report and response

- For this public edition, send concerns to contact@asoainvestments.com with the subject Compliance Concern, or contact ASOA leadership directly when appropriate.
- Use an agency inspector general, contracting officer, law-enforcement, or other protected channel when required or appropriate. Do not obstruct or retaliate against lawful reporting.
- Preserve relevant records. Do not investigate by accessing accounts, systems, devices, or files without authorization.
- ASOA will triage the concern, protect confidentiality to the extent practicable, investigate proportionately, obtain specialist advice when needed, document findings, correct confirmed issues, and make required disclosures.
- Violations may result in removal from work, discipline, contract remedies, repayment, referral, or termination of a business relationship.

Pre-submission certification

☐	The opportunity and amendments came from an authoritative source.
☐	Registration, size, certification, eligibility, and exclusions were checked.
☐	Representations, resumes, experience, and past performance are accurate and attributable.
☐	Conflicts, procurement contacts, gifts, lobbying, and nonpublic information were reviewed.
☐	Security, privacy, CUI, AI, records, accessibility, labor, and place-of-performance requirements were mapped.
☐	Pricing assumptions, labor, costs, and partner quotes are current and supportable.
☐	Teaming roles, workshare, limitations, clauses, and approvals are documented.
☐	Technical, pricing, contracts, compliance, and authorized submission reviews are complete.
☐	The final submission package and evidence are saved in the controlled record.

Verify from the source.

The social-media resource image that prompted this guide identified four useful starting points: SAM.gov, Acquisition.gov, SBA.gov, and APEX Accelerators. ASOA independently verified and expanded the official resource list below. Links were reviewed September 27, 2026.

1. SAM.gov - Contract Opportunities
   https://sam.gov/opportunities
2. SAM.gov - Entity Registration
   https://sam.gov/entity-registration
3. Federal Acquisition Regulation (FAR)
   https://www.acquisition.gov/browse/index/far
4. FAR Part 3 - Improper Business Practices and Personal Conflicts
   https://www.acquisition.gov/far/part-3
5. FAR 52.203-13 - Contractor Code of Business Ethics and Conduct
   https://www.acquisition.gov/far/52.203-13
6. FAR Subpart 9.5 - Organizational and Consultant Conflicts
   https://www.acquisition.gov/far/subpart-9.5
7. Defense Federal Acquisition Regulation Supplement (DFARS)
   https://www.acquisition.gov/dfars
8. DFARS 252.204-7012 - Safeguarding Covered Defense Information
   https://www.acquisition.gov/dfars/252.204-7012-safeguarding-covered-defense-information-and-cyber-incident-reporting.
9. DoD CIO - CMMC Resources and Documentation
   https://dodcio.defense.gov/CMMC/Resources-Documentation/
10. NIST SP 800-171 Rev. 3 - Protecting CUI
    https://csrc.nist.gov/pubs/sp/800/171/r3/final
11. VA Acquisition Regulation (VAAR)
    https://www.acquisition.gov/vaar
12. VAAR Subpart 819.70 - Veterans First Contracting Program
    https://www.acquisition.gov/vaar/subpart-819.70%E2%80%94-va-veterans-first-contracting-program
13. SBA - Veteran Contracting Assistance Programs / VetCert
    https://www.sba.gov/federal-contracting/contracting-assistance-programs/veteran-contracting-assistance-programs
14. SBA - Federal Contracting
    https://www.sba.gov/federal-contracting
15. APEX Accelerators
    https://www.apexaccelerators.us/
16. NIST AI Risk Management Framework
    https://www.nist.gov/itl/ai-risk-management-framework
17. Electronic Code of Federal Regulations
    https://www.ecfr.gov/
18. USAspending.gov - Federal award data
    https://www.usaspending.gov/

CONTROLLED REVIEW

The Compliance Lead reviews this guide at least annually and sooner when ASOA enters a new market, adopts a material AI system, receives a new contract requirement, or a legal or regulatory change affects the business.

OUR STANDARD

Doing Things Right is how ASOA prepares, competes, and performs.

Government customers and partners should expect ASOA to ask careful questions, verify requirements, document decisions, protect information, speak plainly about capability, and correct problems when they arise.

TRUTH	READINESS	ACCOUNTABILITY
Accurate statements and supportable commitments.	Qualified people, protected data, and verified controls.	Named owners, human approval, records, and corrective action.

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ASOA Investments LLC

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Contract lifecycle and AI review

Understanding the requirement through contract completion

Our lifecycle standard

ASOA’s approach to compliance begins with understanding the requirement and continues through contract completion. Our process includes reviewing solicitation instructions and amendments, verifying the support for our representations, assessing partner quotes, and tracking contractual commitments, deliverables, and corrective actions.

AI-supported review

We are developing ASOA Intelligence™ to support this work through documented requirements, source references, review checkpoints, and performance records. Our team remains responsible for verifying findings, approving submissions, and fulfilling our commitments. The goal is consistent execution, clear accountability, and a reliable record of the work performed.

Evidence follows the work

At each review checkpoint, identify the governing source and version, the requirement, the responsible person, the supporting evidence and the review status. Resolve material omissions or conflicts before making a commitment. Carry approved obligations into delivery records, corrective actions and closeout.

Human responsibility

AI findings are review inputs. Authorized people approve representations, pricing, submissions and contractual commitments. Applicable solicitation and contract terms govern each opportunity. Agency performance evaluations are earned through delivery; an award or a particular rating cannot be guaranteed.

Development status

This update states ASOA’s operating standard and planned AI support. It does not claim that production integrations, automated monitoring or authenticated approval controls are already deployed. It supplements the existing guidelines, including their pre-submission review and information protection requirements.