

### Federal Publications One Day Seminar

#### Contractor Business Ethics Compliance Program and Disclosure Requirements

Las Vegas, NV

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On November 12, the FAR Council issued a final rule establishing **The New Contractor Business Ethics Compliance Program and Disclosure Requirements**. The new rule is broad in scope, burdensome in application, and – in some respects at least – almost immediate in its effect. This new, one-day seminar by Federal Publications will examine the requirements of the new rule, which will result in significant changes for all government contractors and subcontractors.

The New Contractor Business Ethics Compliance Program and Disclosure Requirements is an accelerated one-day briefing on what contractors must know about the new rules on:

- Internal Control Systems to Detect and Prevent Improper Conduct
- Codes of Business Ethics and Conduct
- Mandatory Disclosure Obligations
- Requirements for Reporting Violation and Significant Overpayments
- ...and more

Since the rule went into effect on December 12, 2008, and because elements of the new rule apply to all federal contractors, this course is essential to educate and protect your entire organization.

The new rule has four primary elements:

- First, it requires all contractors (including commercial items contractors and small businesses) to establish and promote awareness of a Code of Conduct.
- Second, it requires all contractors to disclose to the Government any “credible evidence” of (i) certain crimes, (ii) a violation of the civil False Claims Act (FCA), or (iii) a significant overpayment by the Government.
- Third, it provides for suspension/debarment for a contractor’s failure to “timely disclose” those same events if there is “credible evidence” to support a violation – even where the event occurred *prior* to the effective date of the new rule.
- Fourth, it mandates that large companies with non-commercial items contracts implement a comprehensive “internal control system.”

Government Contracts Partners Louis Victorino and Jonathan Aronie will be presenting at this conference. For more information please [click here](#).

## Practice Areas

Government Contracts, Investigations & International Trade