

**Summary Federal Acquisition Circular 2005-28
Contractor Business Ethics Compliance Program
And Disclosure Requirements**

Federal Acquisition Circular imposes the following requirements (Full text is available at the Federal Register of December 12, 2008, 73 FR 67064.)

- Contractors are required to disclose violations of criminal law and the False Claims Act in connection with the award and performance of government contracts and subcontracts.
- Contractors are subject to debarment and suspension for knowingly failing to disclose such violations and overpayments in a timely manner.
- Contractors are required to establish internal control systems to facilitate timely disclosure of improper conduct.
- Contractors are required to fully cooperate with Government agencies responsible for audit, investigation, and corrective actions with respect to government contracts.

Previous Federal Acquisition Circular 2005- 22 imposed these related responsibilities.

- Contractors were required to have a written code of business ethics.
- Contractors were required to have an ethics compliance training program for employees.
- Contractors were required to display posters in the work place encouraging their employees to report fraudulent activity in connection with Government contracts.