



**BUSINESS CODE  
OF  
ETHICS AND COMPLIANCE POLICIES**

**April 29, 2004**

**This Code is not an express or implied contract of employment and does not create any contractual rights of any kind between Concurrent and its employees. In addition, all employees should understand that this Code does not modify their employment relationship, whether at will or governed by contract.**

**Concurrent reserves the rights to amend, alter or terminate this Code at any time and for any reason.**

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## INTRODUCTION

Our primary objective as directors, officers and employees of Concurrent Computer Corporation and all its subsidiaries, which we refer to collectively as “Concurrent” or the “Company,” is to maximize the value of our shareholders’ investment in the Company, while conducting our business in a manner that is socially responsible, values-based, and in compliance with the letter and spirit of the law. In furtherance of this goal, Concurrent has adopted this Business Code of Ethics and Compliance Policies, which we refer to as our “Code.”

Our Code sets forth the minimum guidelines and expectations that must be followed by all directors, officers, employees, independent contractors and other personnel of Concurrent (no matter where you work in the world), which we refer to collectively as “employees.” However, no policy can be complete in all respects. Accordingly, good judgment based upon an understanding of laws, regulations and ethics is the best safeguard against improper or unethical conduct.

As a public company, Concurrent’s Chief Executive Officer, Chief Financial Officer, Chief Accounting Officer and any other senior executive or financial officers performing similar functions (the “Senior Executive and Financial Officers”) are subject to a separate policy adopted by our Board, the “Code of Ethics for Senior Executive and Financial Officers.” Additionally, the Senior Executive and Financial Officers, directors and other senior officers, referred to collectively as “Senior Officers” may hold an important and elevated role in corporate governance and are expected to abide by such as well as this Code.

You are expected to learn, understand and follow our Code. Insensitivity to, or disregard of, these policies will constitute an important element in the evaluation of an employee for retention, assignment, and promotion. Any conduct, or any failure to report any conduct, in violation of our Code may be grounds for disciplinary action up to and including termination, and may expose an employee to severe civil and/or criminal liability.

## ETHICS QUICK TEST

Concurrent values integrity, and wants to maintain its reputation for doing the right thing. If you’re ever in a situation in which the right thing is unclear or doing the right thing is difficult, examine your options with the following Ethics Quick Test:

- Could it harm Concurrent’s reputation?
- Is it ethical and legal?
- What would my family and friends say?
- How will it look in the newspaper?
- Would I bet my job on it?
- Should I check?
- How would my action appear to others?

***STILL UNCLEAR?.....***

*Call the Ethics Hotline at*

***1-866-657-0862***

*(calls may be placed anonymously)*

*or contact the Compliance Officer at*

***ethics@ccur.com***

Concurrent’s reputation and your conscience and good name are far too valuable for you to do anything that wouldn’t pass the Ethics Quick Test. In a nutshell, this means that all of us must tell the truth and fulfill our promises. We must treat all stakeholders – fellow employees, investors, customers, suppliers and communities – with honesty, decency and respect.

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## ADMINISTRATION OF OUR CODE

The General Counsel (“GC”) or his/her designee (the “Compliance Officer”) will have overall responsibility for managing and overseeing the Company’s implementation and administration of this Code, including oversight of the “Hotline” for receipt of questions regarding, and reports of potential violations of, our Code and on-going communications to the Company with regard to compliance with the Code. The Compliance Officer and the Human Resources Director are responsible for monitoring compliance with our Code. This shall include periodic audits or other appropriate evaluation techniques to monitor compliance. The Compliance Officer shall have at his/her disposal appropriate resources to discharge his/her responsibilities in managing and overseeing the implementation and administration of the Code.

The Compliance Officer shall make periodic reports to Concurrent’s Board of Directors regarding the implementation and administration of this Code.

### I. EMPLOYEE RESPONSIBILITIES

Any uncertainties regarding legal or ethical issues involving the Company’s affairs should be brought to the attention of your supervisor, the Human Resources Director or the Compliance Officer.

All employees should be alert and sensitive to their own conduct and that of others. If you are aware of or suspect inappropriate, unethical or illegal actions, or actions that otherwise violate our Code, you are obligated to immediately bring the matter to the attention of your supervisor, the Human Resources Director or the Compliance Officer. You are also urged to contact your supervisor, the Human Resources Director or the Compliance Officer with any questions you may have about our Code.

Any employee may communicate with the Compliance Officer, either:

- *Via* e-mail to “Compliance Officer” at [ethics@ccur.com](mailto:ethics@ccur.com); or
- Anonymously by phoning the “Hotline” at 1-866-657-0862

Anonymous communications to the Hotline will not be tracked, so your questions or concerns may remain completely anonymous, if you so choose.

Any concerns regarding accounting, internal accounting controls or auditing matters should be promptly communicated to our Audit Committee via our Accounting/Auditing Complaints Policy.

### II. WHISTLEBLOWER PROTECTION

The Company aims to create a working environment for its employees that is open, honest and fair. We expect employees to call attention to legal or policy violations, and we intend to impartially investigate all such concerns. Concurrent will neither retaliate against any employee for reporting in good faith suspected violations of laws, regulations or company policies, nor tolerate any harassment of or retaliation against any employee by other employees because of such reporting. Any employee who participates in any such harassment or retaliation will be subject to disciplinary action up to and including termination.

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### III. WAIVERS OF OUR CODE

From time to time, in extraordinary circumstances, our Board of Directors may waive certain provisions of our Code. Any employee who believes that a waiver may be appropriate should discuss the matter with the Compliance Officer. Waivers for directors and executive officers may be made only by the Board of Directors or a committee of the Board and will be publicly disclosed in accordance with applicable law, rule or regulation.

### IV. DISCIPLINARY ACTIONS

Concurrent will take appropriate action against any employee whose actions are found to violate the policies set forth in our Code or any other policies of the Company. As noted above, compliance with the Code will be an element in the evaluation of employees. Failure to comply with the Code will be grounds for immediate termination of employment or other disciplinary action in the sole discretion of the Company depending on the circumstances of each such failure. Concurrent, in consultation with legal counsel, shall take any appropriate remedial or other action as warranted under the circumstances.

### V. CONFIDENTIALITY

In all cases, there will be no reprisals for making any reports of violations of our Code, and all efforts will be made to maintain confidentiality.

### VI. INTERACTION WITH OTHER COMPLIANCE MATERIALS

The Code provides information about our standards of integrity and explains our legal and ethical responsibilities. It does not address every specific situation or set forth a rule that will answer every question. Rather, it is intended to provide guidance on our responsibilities and assist employees in making ethical and legal decisions. Additional requirements are set forth in detail in the Company's:

- Employee Handbook, which covers topics such as (1) fair dealing between employees; (2) non-discrimination; (3) no harassment; (4) health and safety; (5) substance abuse; and (6) personnel files, among others;
- Accounting/Auditing Complaint Policy;
- Code of Ethics for Senior Executive and Financial Officers;
- Procedures and Guidelines Governing Insider Trading and Tipping, and
- Section 16 Officer Memorandum

To obtain copies of these materials, you should contact the Compliance Officer.

### VII. COMPLIANCE POLICIES

Our Code includes the series of statements of compliance policies ("Policy Statements") that follow. Some of them are summaries of more complete Company policies you may obtain by contacting the Human Resources Director or the Compliance Officer. From time to time, we may publish revisions or supplements to the Policy Statements based on changes in the regulatory environment, changes in the businesses we conduct, or other factors.

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VIII. EDUCATION AND TRAINING

To ensure that all employees, officers, and directors are familiar with the Code, all employees of the Company shall receive, at a minimum, a copy of the Code. Employees shall also be provided periodic information about the Code, including updates through the Company's website or other appropriate means of communication.

The Compliance Officer shall identify appropriate Concurrent personnel to receive training with respect to the Code and is responsible for coordinating such training.

IX. EMPLOYEE COMMITMENT

All employees are required to adhere to the letter and spirit of our Code. This means complying with the law in all places where we do business. We encourage employees to engage in ethical behavior at all times and to discuss questions or concerns with your supervisor, the Human Resources Director or the Compliance Officer whenever you are in doubt regarding the most prudent course of action.

All employees must acknowledge their commitment to adhering to our Code and other Company policies by completing an acknowledgment form when they first become employed with the Company and thereafter when requested by the Company.

<b>My Acknowledgment Of Concurrent's Business Code of Ethics and Compliance Policies</b>	
I hereby acknowledge that I have received a copy of, read and fully understand the letter and spirit of Concurrent's Business Code of Ethics and Compliance Policies (our "Code").	
I hereby further acknowledge that our Code does not create any contractual rights of any kind between me and Concurrent, and does not modify my employment relationship with Concurrent, whether such relationship is at will or governed by contract.	
I understand that every employee is required to comply with the letter and spirit of the policies set forth in our Code and of the other policies of the Company, and failure to do so may subject me to disciplinary action, up to and including termination of my employment.	
If I become aware of or suspect a violation or possible violation of our Code or any other Company policy, I will inform my supervisor, the Human Resources Director or the Compliance Officer. Currently, I am not aware of any violation or possible violation of our Code or other Company policy.	
_____ Date	_____ Employee Name (Please Print or Type)
	_____ Employee Signature
	4.29.04

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## CORE VALUES

Our collective mission at Concurrent is to maximize the value of our shareholders' investment in the Company while maintaining our core values, which are embodied generally under the following principles:

- We conduct our business in a socially responsible manner within the letter and spirit of both the law and our Code;
- We recognize that our employees are our greatest strength. The quality of our employees differentiates us and personifies our leadership position;
- We treat our business partners, customers, consumers and employees, and the general public with respect and dignity;
- We take very seriously our reputation for honest and ethical business dealings around the world; and
- We seek customers, consumers and business partners whose ethical standards mirror our own and decline to do business with unethical entities and individuals.

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## POLICY STATEMENT – I

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### PROTECTING COMPANY ASSETS AND INFORMATION

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#### I. NEED FOR POLICY

Everyone working for Concurrent has a duty to safeguard the Company's assets against theft, loss or misuse. These assets belong to the Company's shareholders and they are valuable resources. They include intangible assets, for example customer lists, manufacturing processes, engineering drawings and specifications and a variety of information in written form or digitally stored, as well as tangible assets such as money, equipment, supplies, facilities and materials.

There is always a substantial risk of information passing into the possession of unauthorized persons. Therefore, constant vigilance in protecting the Company's proprietary information is essential. Similarly, responsible management of the Company's resources requires an accurate accounting for uses made of the Company's material assets. Company resources must not be diverted for unauthorized uses.

#### II. PROPER USE OF COMPANY ASSETS

Every employee with access to Company money or property has an absolute responsibility to manage it with the highest level of integrity and to avoid any misuse of such assets. Fraud, theft, embezzlement or other improper means of obtaining corporate funds by an employee is unethical, illegal and completely unacceptable.

All Company assets should be used for legitimate business purposes. The misuse or removal from Company facilities of the Company's property is prohibited, unless specifically authorized. This applies equally to property, such as furnishings, equipment and supplies, as well as to property created, obtained or copied by the Company for its exclusive use, such as client lists, files, reference materials and reports, computer software, data processing systems, and databases. Neither originals nor copies may be removed from the Company's premises or used for purposes other than Company business without the Company's authorization. The integrity of the computer programs and data that comprise the information assets of the corporation must not be compromised. Care must be exercised to protect these against intentional or unintentional corruption.

Continual care is expected to be taken to limit losses from theft by normal precautions and by handling Company assets in a prudent manner. This includes locking up equipment, supplies and materials when no one is around to secure them, reporting suspicious persons or activities to supervisory personnel and avoiding discussions of sensitive or confidential Company information in the presence of unauthorized persons.

#### III. INTERNET AND E-MAIL POLICY

Concurrent provides Internet access at work to employees to accomplish legitimate Concurrent business purposes in the course of their assigned duties. It is inappropriate to use Concurrent systems to visit Internet sites that feature sexual content, gambling, or that advocate intolerance of others. Concurrent permits employees to use home Internet accounts for Concurrent business purposes provided that they follow this Policy Statement at all times while using home accounts for Concurrent business purposes. All computer systems having access to the Internet and being used for Concurrent business purposes must have approved virus protection software and must have a firewall system in place. Further, the

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Company prohibits employees from discussing or posting information regarding the Company in any external electronic forum, including Internet chat rooms or electronic bulletin boards, unless the employee is specifically authorized to do so.

Concurrent has installed an e-mail system to facilitate effective communications. The e-mail system and the contents of all e-mails are Company property. Concurrent reserves the right, at any time and without prior notice, to examine all messages created, received and sent over the e-mail system, personal file directories and other information stored on Concurrent computers. The Company recognizes that employees may use e-mail, the Internet and Company computers for personal use. However, such use must be minimized and all use is subject to review and monitoring by the Company. You must always be aware that your use of these assets in any and all manners is subject to rigorous scrutiny.

#### IV. INTELLECTUAL PROPERTY

Concurrent has made a major investment in its intellectual property (“IP”) which includes its patents, copyrights, trade names, trademarks, brand names, processes, data, know-how, ideas, inventions, trade secrets, formulas, improvements, business information, production techniques, computer software and programs, models, documentation, and vendor and customer contract information and lists. IP developed by employees within the scope of their employment is the exclusive property of Concurrent. This is true whether or not an employee makes the developments during working hours, on Company premises, or using Company material or resources. Protecting the Company’s IP is a high priority for the Company and all its employees.

In addition, in certain circumstances the Company’s IP may consist of technology or software source code that is controlled for export by the U.S. Government. In such circumstances, no person can export, disclose or transfer, by any means, the Company’s IP to foreign nationals, even foreign nationals located in the U.S., without export or reexport authorization from the appropriate U.S. Government agencies.

Concurrent's IP is extremely valuable to the Company. It is also extremely susceptible to compromise. In order to protect our IP, all employees should use their best efforts to:

- Recognize the Company's IP assets and proprietary information;
- Identify new IP developed so it can be captured for protection;
- Assist in securing Concurrent's ownership of IP assets;
- Assist, where appropriate, in registering, patenting and otherwise legally protecting IP assets and proprietary information;
- Secure licenses from a third-party given access to our IP (seek assistance from GC);
- Prevent any infringement or misuse of the Company’s IP or proprietary information;
- Notify the GC of any potential infringement or misuse of the Company’s IP;
- Do not disclose to unauthorized individuals, whether inside or outside of the Company, any information which would tend to compromise proprietary technologies or trade operating secrets;
- Obtain any required U.S. Government authorization before exporting, disclosing, or otherwise transferring, by any means, any export-controlled Company IP to foreign nationals; and
- Ensure that every third-party signs a Concurrent nondisclosure agreement (NDA) before receiving any of Concurrent’s IP.

These obligations apply even after an individual has left the employment of the Company.

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## V. PROPRIETARY RIGHTS OF OTHERS

Just as Concurrent expects its IP rights to be observed, Concurrent respects the property rights of others. Unauthorized use of the IP rights of others may expose Concurrent to civil law suits and damages. In many countries, theft and misappropriation of trade secrets, proprietary information or other IP may result in significant fines and criminal penalties to both Concurrent and to the individual. Accordingly, you should not intercept, duplicate, or obtain any IP owned by third parties. When new employees are hired, it is especially important to ensure that they do not improperly disclose or use any third-party's confidential information. Additionally, any IP obtained from third parties must be used pursuant to proper licenses.

## VI. CONFIDENTIAL INFORMATION

Confidential information includes all information not generally known by the public about Concurrent's business. Employees must maintain the confidentiality of all such information entrusted to them by the Company, its customers or other third-parties to whom we have an obligation of confidentiality or secrecy, except when disclosure is authorized by the appropriate Senior Officers or is legally mandated. Any doubt as to whether any information is of such a nature should be resolved in favor of confidential treatment.

Documents and written materials containing confidential information sometimes carry labels or stamps to that effect which should always be observed. However, whether information is, in fact, confidential is not determined by whether or not it is labeled as such. Thus, the absence of any confidential label or stamp should never be taken to indicate information need not be protected.

## VII. RESTRICTED ACCESS

Each employee shall protect confidential information, whether material or not, by restricting access to such information only to other employees and only on a "need to know" basis. This means that every reasonable effort shall be taken to limit both the number of other employees becoming aware of confidential information and the duplication and circulation of written materials containing such information. Employees should handle carefully any documents containing confidential information, whether material or not, during working hours, and properly secure them at the end of the workday. Employees should pay particular attention to the security of data stored on his/her computer systems, and must maintain the secrecy of all computer passwords, log off from all computer systems at the end of each work day, and secure any equipment when not in use.

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## POLICY STATEMENT – II

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### CONFLICTS OF INTEREST AND CORPORATE OPPORTUNITIES

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#### I. NEED FOR POLICY

An employee's relationship to the Company is based on loyalty and shared goals between the individual and the corporation. This foundation is fundamental to the advancement of Concurrent's business interest and the employment relationship. A "conflict of interest" occurs when an individual's private interest interferes in any way, or even appears to interfere, with the interests of the Company as a whole. A conflict can arise when an employee has interests that make it difficult for him or her to perform his/her Company work objectively and effectively. Conflicts of interest also arise when an employee, or a member of his/her family, receives improper personal benefits as a result of his/her position with the Company.

#### II. CONFLICTS OF INTEREST

Conflicts between the Company's best interest and those of employees may arise in a number of different ways, such as:

- Trading in the Company's or another company's stock on the basis of confidential information;
- Representing the Company in any dealing in which the employee has a vested interest, directly or indirectly;
- Engaging in any business dealing on behalf of the Company with a relative by blood or marriage, or with a company of or for which a relative by blood or marriage is a key member;
- Soliciting personal favors from those with whom Concurrent does business;
- Accepting any type of payment (cash, stock, services, entertainment, travel, gifts, *etc.*) of more than nominal value, from any company, firm or individual which does or is seeking to do business with Concurrent;
- Selling one's services to other companies with whom Concurrent competes or does business; or
- Having a financial interest in any Concurrent customer, supplier, distributor, sales representative or competitor that might cause divided loyalty or even the appearance of divided loyalty.

These situations, and others like them, must be avoided unless approved by the Compliance Officer. Where there is doubt about the propriety of a transaction, it should be resolved by consulting with the Compliance Officer.

Whether there is a financial conflict of interest depends upon many factors, including: (a) whether the employee can influence the Company's decisions that might affect a personal financial interest; (b) the size of the employee's investment or financial interest; and (c) the nature and extent of the competition or the relationship between the Company and other business.

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Loans from the Company to an employee (including the direct or indirect extension of credit) can create conflicts of interest and other potential concerns for operating our business in the most ethical and prudent manner. Loans from the Company to employees must be approved in advance by the Director of Human Resources and the Chief Financial Officer or his/her designee. Loans from the Company to directors or executive officers are prohibited.

In general, a member of an employee's immediate family can be considered for employment by the Company, provided the applicant possesses all the qualifications for employment. However, unless approved by the Director of Human Resources or the Compliance Officer, an immediate family member may not be employed if such employment would create either supervisor/subordinate relationship or otherwise create a conflict of interest. "Immediate family member" means father, mother, brother, sister, spouse, son, daughter, father-in-law, mother-in-law, son-in-law, daughter-in-law, stepfather, stepmother, stepbrother, stepsister, stepson, stepdaughter, grandfather, grandmother, grandchild, foster child or guardian. Employees who marry or become members of the same household subsequent to their employment may continue employment as long as it is in compliance with this Policy Statement.

Without prior approval of one's supervisor, employees may not perform outside work for other parties or solicit such business on Company premises or while working on Company time, which includes time given with pay to handle personal matters. Neither are they permitted to use Company equipment, telephones, materials, resources or proprietary information for any outside work.

Each employee must promptly disclose actual or potential conflicts of interest to the Compliance Officer. In many cases, a potential conflict of interest may be avoided by making a full disclosure of the facts prior to any transaction thereby permitting the Company to make an informed, independent decision regarding the transaction.

### III. CORPORATE OPPORTUNITIES

Employees owe a duty to the Company to advance its legitimate interests when the opportunity to do so arises. An employee may not:

- Personally take advantage of a business opportunity that rightfully belongs to the Company;
- Derive personal profit, gain or advantage (other than compensation from the Company) as a result of any transaction undertaken on behalf of the Company or from corporate property, information or position; or
- Compete, directly or indirectly, with the Company.

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## POLICY STATEMENT – III

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### PREVENTION OF INSIDER TRADING

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#### I. NEED FOR POLICY

The Company has both ethical and legal responsibilities to maintain the confidence of its shareholders and the public securities markets generally and to protect as valuable Company assets confidential and proprietary information developed by or entrusted to it. In particular, violations of the laws against insider trading of Company securities and tipping by employees based on possession of material non-public information can expose the Company and its employees to severe civil and criminal liability, including criminal treble damages, civil monetary penalties and imprisonment.

If you have any doubt whether a particular situation requires refraining from making an investment or sharing information with others, such doubt should be resolved against taking such action.

#### II. INSIDER TRADING

In the course of performing your duties, you may learn information about the Company that is not generally available to the public. We all have a responsibility to keep company information confidential until it is officially made public. If the non-public information a person possesses is "material," the disclosure of that information or making investment decisions while in possession of it can result in a violation of the federal securities laws.

"Material" information about a public company is information that would be expected to (a) affect the decision of a reasonable investor to purchase or sell the company's securities, or (b) alter the market price of the company's securities. It is often very difficult to determine whether particular information is or is not material under this definition. You should consider information about Concurrent "material" if it would affect in any way your own consideration of whether to buy, sell, or hold Concurrent stock.

The most common example of "inside information" is information about the Company's earnings, financial performance, and revenue statistics that have not yet been publicly disclosed. Examples also might include information about significant events, such as new products and services, joint ventures, acquisitions or divestitures, and substantial contract awards or terminations that have not yet been made public.

Information is considered to be "non-public" until (a) it has been released and reported in the media or included in publicly available documents filed with the SEC, and (b) investors have had sufficient time to absorb the information. Information is generally considered to be "non-public" until two business days after the information is released to the general public.

Insider trading or tipping is both illegal and unethical, and you should not trade in any stock or other securities on the basis of such "inside information," including inside information you may learn about a company with which Concurrent does or might do business.

Concurrent, like many public companies, has adopted specific trading restrictions to guard against insider trading. These restrictions are set forth in the Procedures and Guidelines Governing Insider Trading and Tipping. You may obtain a copy by contacting the Compliance Officer.

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### III. DISCLOSURE OF MATERIAL NON-PUBLIC INFORMATION

Generally, public disclosure of material non-public information is the responsibility of the Senior Officers or their authorized representatives. Accordingly, employees or associates shall maintain confidentiality of such information both within and outside the Company at all times regardless of whether public disclosure has or is believed to have occurred.

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## POLICY STATEMENT – IV

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### ACCURACY OF CORPORATE RECORDS AND FINANCIAL REPORTING

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#### I. NEED FOR POLICY

Numerous parties, both inside and outside the Company, have a legitimate interest in Concurrent's operations and financial results. They rely on the timeliness, accuracy and integrity of our own record keeping to make decisions concerning a wide range of critical matters. These records are the basis for managing the Company's business and for fulfilling its obligations to its shareholders, employees, customers, suppliers and regulatory authorities.

#### II. STATEMENT OF POLICY

Every employee involved in creating, transmitting or entering information into Concurrent's financial and operational records (including time sheets, sales records and expense accounts) is responsible and must take care to do so completely, honestly and accurately. In addition to the policies discussed below, Senior Officers must also comply with the requirements relating to financial records and periodic reports in our "Code of Ethics for Senior Executive and Financial Officers."

To ensure compliance with this Policy Statement, all employees must:

- Ensure that business transactions are properly authorized and completely and accurately recorded in all material respects on the Company's books and records in accordance with generally accepted accounting principles and the Company's established financial policies;
- Detail the true nature of every transaction or payment in its supporting documentation;
- Report the existence of any undisclosed or unrecorded funds or other assets;
- Ensure that reports filed with or submitted to the SEC and other public communications contain information that is full, fair, accurate, timely and understandable and do not misrepresent or omit material facts;
- Cooperate with investigations into or audits of the accuracy and timeliness of financial records;
- To the extent estimates and accruals are necessary in Company reports and records, ensure they (i) are supported by appropriate documentation and based on good faith judgments, (ii) are compliant with the Company's accounting policies and procedures, and (iii) to the extent material, have been approved by the Company's Chief Financial Officer;
- Ensure payments are made only to the person or the firm that actually provided the related goods or services;
- Ensure that the retention or disposal of Company records is in accordance with established Company policies and applicable legal and regulatory requirements; and
- Ensure that contacts with taxing authorities are handled in accordance with the Company's accounting policies and procedures.

Expense accounts are another important corporate record. Employees are entitled to reimbursement for reasonable business expenses, but only if those expenses are actually incurred. To submit an expense account for meals not eaten, miles not driven, airline tickets not used, or for any other expense not

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incurred is dishonest reporting and will be grounds for disciplinary action up to and including termination. Submission of personal expenses as business expenses is prohibited!

Destruction, alteration or falsification of documents or records with the intent to impede, obstruct or influence the investigation or proper administration of any matter within the jurisdiction of any governmental department or agency of the United States is strictly prohibited.

### III. ACCOUNTING PROCEDURES

All transactions must be properly recorded on Concurrent's books and records. No unrecorded bank accounts, corporate funds or assets may be maintained, and all entries made in any corporate books or records must be accurate and comply with general accepted accounting principles and other Concurrent accounting policies and procedures. Furthermore, it is the responsibility of all employees to ensure that all financial recordkeeping and records to governmental agencies be truthful, accurate and not otherwise misleading.

### IV. FRAUD AND EMBEZZLEMENT

Any type of fraud or embezzlement will result in serious consequences and disciplinary action up to and including termination. According to the American Institute of Certified Public Accountants, fraud and embezzlement include the following:

- Misappropriation or embezzlement of any of Concurrent's property, assets or services;
- Intentional misstatement, misclassification or omission in Concurrent's financial statements, including intentional misapplication of accounting principles; and
- Manipulation, falsification or alteration of accounting records or supporting documentation.

If you suspect that fraud or embezzlement has occurred, you must immediately notify your supervisor, or the Compliance Officer so that they may notify Concurrent's Board of Directors. The Board of Directors has developed procedures for handling suspected fraud or embezzlement and will coordinate the investigation with the Compliance Officer and other appropriate individuals. For further information, see the Accounting/Auditing Complaint Policy.

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POLICY STATEMENT – V

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WORKING WITH GOVERNMENTS

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I. NEED FOR POLICY

Doing business with federal, state, local and international governments is not always the same as doing business with private parties. Activities that might be appropriate when working with private sector customers may be improper - or even illegal - when a national, state, or local government is our customer.

II. GOVERNMENT CONTRACTS

Concurrent provides products and services under several contracts with federal, state and local government agencies. Employees who are involved with those contracts must be careful to follow additional rules that apply to government contracts. For instance, it is illegal under both U.S. federal and state law to solicit, offer, or pay any bribe or other gratuity to a public official for the purpose of influencing an official act or decision; and it is illegal under the U.S. False Claims Act to file a false report or make any false statement for the purpose of either making a claim for payment from any government agency, or avoiding a specific payment obligation to any government agency.

III. RELATIONS WITH PUBLIC OFFICIALS AND THE U.S. FOREIGN CORRUPT PRACTICES ACT

In dealing with legislators, regulatory agencies, government agents or other public officials, employees must not engage in any conduct intended to improperly influence those officials or their associates into taking improper actions. As a general proposition, payments, gifts or other things of value are not to be given to any such government representative. Any deviation from this Policy Statement requires approval of the Compliance Officer.

In general, the United States' Foreign Corrupt Practices Act (the "FCPA") restricts U.S. companies, such as Concurrent, and its employees from making or offering to make illegal payments or political contributions to foreign officials for the purpose of obtaining or retaining business or to otherwise secure any improper advantage. Any employee found guilty of violating the FCPA could be personally subject to criminal fines of \$100,000 or more (fines imposed under the FCPA cannot be paid by an employer), five (5) years in prison, or both. In addition, any such violation could also subject Concurrent to severe criminal and civil penalties.

The FCPA has two basic parts: (1) anti-bribery provisions, and (2) accounting and record-keeping requirements. The FCPA prohibits a wide range of bribes, including knowingly making a payment, an offer or promise to pay, or an authorization of a payment, offer or promise. The FCPA's definition of "bribe" includes anything of value (cash or anything else) given or offered as an inducement to obtain, retain, or direct business or otherwise to secure any improper advantage. The bribe does not need to be completed for an FCPA violation to occur assuming the other elements of a violation are present (i.e., an offer or promise can violate the FCPA in certain circumstances). The FCPA prohibits bribes to any officer or employee of an international agency, a foreign government or any department, agency, or instrumentality of a foreign government, any foreign political party, foreign party official or candidate for foreign political office, and any person acting on behalf of any one or combination of these, including

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part-time government employees and any other person if there is reason to believe that such person would pass on a prohibited payment or benefit to an officer or employee of a foreign government.

Additionally, a U.S. company, such as Concurrent, may be held liable for payments prohibited by the FCPA made by its foreign commercial agents, representatives, suppliers, brokers, or other parties acting on its behalf if the company has prior knowledge of or should reasonably have known about such payments (companies may also be held liable for bribes made by their controlled foreign subsidiaries). Where circumstances indicate that the company or its employees “turned a blind eye” or engaged in willful blindness with respect to conduct that violates the foreign bribery provisions of the FCPA, the company or an employee can be deemed to have knowledge of that unlawful conduct. Thus, Concurrent and its employees have a duty to inquire in circumstances indicating that such conduct may have occurred on their behalf.

The FCPA has certain narrow exceptions, which are described briefly below. No Concurrent employee, however, may make a decision that any particular circumstances qualify for one of these exceptions, without first consulting with the Compliance Officer. Such exceptions are as follows: (1) certain “facilitating or expediting payments” for “routine governmental action” (this does not include any decision by a foreign official whether, or on what terms, to award new business or continue business with a particular party, or any action taken by a foreign official involved in the decision-making process to encourage a decision to award new business to or continue business with a particular party); (2) payments that are legal under the written laws and regulations of the foreign country; (3) payment of certain limited bona fide expenses such as for travel and lodging directly related to the promotion, demonstration, or explanation of a product or service or for the execution or performance of a contract with the foreign government.

The FCPA’s accounting and record-keeping provisions apply to public companies, such as Concurrent. These accounting provisions require reporting companies to make and keep books, records, and accounts which “in reasonable detail” accurately and fairly reflect the transactions and dispositions of the assets of the issuer. The FCPA further requires a company to devise and maintain a system of internal accounting controls sufficient to provide “reasonable assurances” that transactions are executed in accordance with management’s general or specific authorization and that transactions are recorded as necessary to permit preparation of financial statements in conformity with generally accepted accounting principles and to maintain accountability for assets. The internal accounting controls provision applies to the controls of foreign subsidiaries which are more than 50% owned by the issuer.

Consistent with the FCPA, Concurrent corporate policy requires that:

- No employee or agent pay, offer, promise, or authorize a “bribe” to any foreign official, as described above;
- No employee or agent may establish any undisclosed or unrecorded fund of cash or assets for any purpose, or make any false, artificial, or misleading entries in any books or records of Concurrent;
- No employee or agent approve or make any payment for any purpose other than that described by the document supporting the payment; and
- The Compliance Officer must provide prior written approval before an employee or agent:
  - Makes any payment subject to the FCPA’s narrow exceptions or gift to a foreign official or political party official, international public official or foreign political candidate, or any person acting on their behalf;

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- Makes contributions to campaigns of foreign political parties, officials or candidates;
- Engages an agent, consultant, or advisor who may have dealings with foreign governments or political parties on behalf of Concurrent; or
- Engages in any transaction in which circumstances indicate an FCPA prohibited payment may have been or will be made, including making any payment arrangements where a person performing services or selling goods in one country requests that payments be made in another country (“split payments arrangements”).

#### IV. TRADE CONTROLS

Many countries regulate international trade transactions, such as imports, exports and international financial transactions for a variety of reasons, including national security and foreign policy. In addition, the U.S. prohibits any cooperation with boycotts imposed by foreign countries that are unsanctioned by the U.S., including the Arab League boycott of Israel. In many cases, any requests received by the Company to cooperate in unsanctioned boycotts must be reported by the Company to the Office of Antiboycott Compliance, U.S. Department of Commerce, and the Internal Revenue Service.

Accordingly, employees who handle one or more international transactions should be sure to:

- Follow relevant international trade control regulations, including those governing licensing, shipping documentation, import and export documentation and recordkeeping, reporting and record retention requirements of all countries in which you conduct business or in which your business is located; in some cases, these restrictions will apply to international trade in goods, technology, software and services as well as to financial transactions;
- Learn and understand the extent to which U.S. trade controls apply to transactions conducted by you, even outside the U.S.;
- Make sure all transactions are screened against all applicable laws and regulations that restrict (1) transactions with certain countries, companies, persons and other entities, and (2) transactions involving certain end-uses and activities;
- Consult with the Compliance Officer or your supervisor in any transaction in which a conflict arises between U.S. law and the law of another country or region, such as the laws blocking certain U.S. trade restrictions adopted by Canada, Mexico and the members of the European Union; and
- Understand which party to the import or export transaction bears legal responsibility for the accuracy of import or export documentation; where Concurrent bears legal responsibility, establish procedures to monitor and verify the accuracy and completeness of information presented to government authorities by Concurrent or by any agent acting on behalf of Concurrent; where an agent or a customer is the responsible party, ensure that Concurrent provides the full and accurate information the other party needs to complete import or export documents;
- Do not export, release, disclose, permit access to, or otherwise transfer any export-controlled technology or software source code to foreign nationals, even foreign nationals located in the U.S., without required authorizations from appropriate U.S. Government agencies; and
- Do not cooperate with any restrictive trade practice or boycott prohibited or penalized under U.S. or applicable local laws, and immediately report any requests for such cooperation you receive to the Compliance Officer.

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## V. RESPECTING LOCAL LAW AND CUSTOMS

As in the United States, it is Concurrent's policy to obey the law wherever we operate. Also, in the conduct of our business affairs outside the U.S., we endeavor to respect local customs and institutions. However we must not use local custom as an excuse for violating applicable laws or corporate policies. We regard observing local law to be the minimum acceptable level of conduct, but Concurrent's own standards frequently oblige us to go beyond that legal minimum and to conduct our affairs according to a higher standard. Where conduct resulting from adherence to this Code is inconsistent with local law, custom and prevailing practices, the Compliance Officer may allow for compatible area or country policies which more definitively anticipate local operating conditions, laws, customs and cultural differences.

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## POLICY STATEMENT – VI

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### RELATIONS WITH CUSTOMERS, SUPPLIERS AND COMPETITORS

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#### I. NEED FOR POLICY

The key to Concurrent’s success lies in our ability to deliver goods and services of consistently high value to our customers and suppliers. This includes manufacturing and sourcing products which perform according to specific expectations, promoting those products truthfully, and providing effective support and service. Concurrent depends on long-term, continuing relationships with satisfied customers and suppliers, not isolated single sales. Therefore, it is essential to develop relationships with this long-term objective in mind. Cultivating an atmosphere of trust and selling our products on the basis of merit, are fundamental to this long-range approach.

#### II. FAIR DEALING

Each employee must endeavor to deal fairly with the Company’s customers, suppliers and competitors. No employee should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair-dealing practice.

#### III. ANTITRUST

Concurrent requires the absolute avoidance of any conduct which violates, or which might even appear to violate, antitrust laws which forbid understandings or agreements between competitors regarding prices, terms of sale, profits, division of markets, credit arrangements, methods of distribution, allocation of customers, marketing or market share, “tying” arrangements where a customer is required to buy one product or service in order to obtain another, or any other activity that restrains competition. No employee, whatever his position, is authorized to depart from this Policy Statement or to condone a departure by anyone else.

In the normal course of business, it is not unusual to acquire information about many other organizations, including competitors. Doing so is a normal business activity and is in itself legitimate. Concurrent quite properly gathers this kind of information for competitive purposes. The Company also collects information on competitors from a variety of legitimate sources to evaluate the relative merits of its own products, services, and marketing methods. This activity is proper and necessary in a competitive system.

However, there are limits to the ways that information should be acquired and used, especially information about competitors. Employees should not employ improper means to acquire a competitor’s trade secrets or other confidential information, such as hiring a competitor’s employees solely to get confidential information or soliciting confidential data from a competitor’s employees. Further, if an employee comes upon a third-party’s confidential information, that material should be destroyed or provided to the GC for review.

In the interest of furthering full compliance of this Policy Statement, each employee who interfaces with customers is required to submit a written statement certifying that he/she is not aware of any side agreements, written or oral, with any third party or in the alternative, providing a summary of any side agreements known.

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Even innocent contact with our competitors carries the risk of being viewed as a possible conspiracy. Consequently, any unnecessary contact with the Company's competitors should be avoided. Penalties for antitrust convictions can be extremely costly to the Company and those individuals who are involved may be subject to criminal prosecution in addition to disciplinary action up to and including termination. As a general rule, employees should limit contacts and communications with competitors to those which are inadvertent and unavoidable, as in trade shows and certain outside seminars (still being careful not to share pricing or other non-public competitive information), and must seek clearance from the Compliance Officer before engaging in further contacts or communications, including advance approval before attending trade association meetings or other meetings where competitors are expected to be in attendance.

In addition to restricting agreements among competitors, antitrust law also restricts other actions that may harm competition and consumers. For example, in certain circumstances, exclusive dealing arrangements or exclusive distribution arrangements may raise antitrust concerns. Antitrust law also restricts the ability of a competitor to discriminate in pricing among similarly situated buyers. Employees should check with the Compliance Officer before agreeing to pursue any arrangement that might harm competition or raise antitrust concerns.

#### IV. DEFAMATION OF COMPETITORS

In its advertising, representations and marketing activities, it is Concurrent's policy to emphasize the quality of its products or services and to abstain from making defamatory comments about competitors or their products or services. Statements (oral or written) made concerning a competitor or its products must be fair, factual and complete.

Employees should observe the following rules when communicating about a competitor or its products or services:

- Comments about a competitor's character or business practices should be avoided (*e.g.*, telling a customer that a competitor's sales representative is untrustworthy);
- Concurrent products and services should be sold with primary emphasis on Concurrent's capabilities, know-how and benefits to its customer, rather than on a competitor's deficiencies; and
- Unsubstantiated claims or comparisons should not be made.

#### V. MEDIA CONTACT

In order to make sure that news released about Concurrent is accurate, timely, consistent and in compliance with applicable legal requirements, such releases and public communications are the responsibility of Concurrent's Senior Officers, Director of Investor Relations and Director of Strategic Communications, to be carried out pursuant to appropriate procedures as they shall develop and are implemented. As a general rule, all inquires from trade or general news media should be referred to the Director of Strategic Communications and all inquires from finance news media should be referred to the Director of Investor Relations.

#### VI. GIFTS AND ENTERTAINMENT

Concurrent's policies and practices encourage the use of good judgment, discretion, and moderation when giving or accepting gifts or entertainment in business settings. Gift giving and entertainment practices may vary in different cultures; however, any gifts and entertainment given or received must be

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in compliance with law, must not violate the giver's and/or receiver's policies on the matter, and be consistent with local custom and practice. Further, employees should never accept or provide gifts, favors, travel or entertainment if they compromise or appear to compromise your judgment.

Employees may offer and accept nominal gifts as long as such complement the business relationship and are not intended and do not appear to improperly influence the recipient. However, in all circumstances, such giving must be consistent with the Company's more detailed compliance programs and policies. Gifts to foreign officials are subject to the above described policies regarding compliance with the FCPA. Examples of gifts which are considered acceptable would include such widely distributed specialty advertising items as clothing and desktop accessories bearing a Company monogram, tickets to local sports or cultural events, restaurant meals and other tokens of goodwill with nominal market value. Provision or furnishing of any gifts or entertainment not meeting these general guidelines shall require prior approval of the Compliance Officer.

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