



## **Supplier Code of Conduct**

### **Introduction**

Peraton is committed to the highest standards of business ethics and regulatory compliance. We gain trust by treating others with integrity, respect, and fairness. We demonstrate these values in all our interactions, every day.

### **Scope**

The provisions of this Code apply to all Peraton partners, suppliers, subcontractors, and agents, as well as the employees of those entities (collectively, our "Suppliers").

### **Policy**

All Suppliers must comply with the provisions set out in this Code. Suppliers must also comply with all laws, rules, and government regulations applicable to the work they are performing on behalf of Peraton.

### **Ethical and legal conduct and Peraton policies**

Suppliers are expected to act with the highest standards of business ethics and must not engage in any fraudulent conduct or behavior. In addition to this Supplier Code of Conduct, Suppliers must also comply with any Peraton policy or contractual provision incorporated into our agreement with each Supplier.

### **Equal opportunity**

Unlawful discrimination in the workplace is prohibited. When conducting Peraton business, Suppliers must not discriminate against anyone because of gender, color, race, ethnicity, national origin, religion, age, marital status, sexual orientation, gender identity and expression, disability, pregnancy, covered veteran status, protected genetic information, and political affiliation or any characteristic protected by law.

### **Work environment**

Peraton prohibits acts of harassment and any other abusive or offensive conduct based on race, color, national origin, ethnicity, ancestry, citizenship, sex, gender identity or expression, pregnancy, sexual orientation, religion, age, disability, veteran status, genetic information, marital status, or any other characteristic protected by applicable state or local law.

Peraton is committed to providing a work environment free of sexual harassment. Sexual harassment is one form of harassment, characterized by unwelcome or inappropriate sexual advances, unwelcome requests for sex or sexual favors, or other unwelcome verbal statements, physical actions, or visual cues or other circumstances of a sexual nature when:

- submission to, or tolerance of, such conduct is made explicitly or implicitly a term or condition of an individual's employment; or
- submission to, or tolerance of, or rejection of such conduct by an individual is used as a basis for an employment decision affecting this individual; or
- such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment.

Suppliers must comply with environmental, health, safety and security policies and procedures, and correct or report any environmental, health, safety, or security threats. Acts of workplace violence will not be tolerated. Workplace violence includes acts or threats of physical violence and any conduct that is sufficiently severe, offensive, or intimidating to result in another individual becoming reasonably fearful or apprehensive about his or her safety or the safety of his or her family or property.

## **Anti-corruption**

Suppliers must not offer or provide bribes, kickbacks, or gifts to win or retain business or to otherwise improperly influence a business decision. Suppliers are prohibited from offering, promising, or providing money or anything of value, either directly or indirectly, by employees or through other parties, to government officials or commercial companies affiliated with a government entity for the purpose of obtaining or retaining business or otherwise gaining a business advantage. Suppliers may not offer or make facilitation payments to any government official for routine government actions, either directly or indirectly.

Suppliers must comply with all ethical standards and applicable law in every country in which Peraton does business, including the U.S. Foreign Corrupt Practices Act ("FCPA") and the UK Bribery Act ("UKBA"). The FCPA and UKBA prohibit any payment or gift to government officials, political parties, candidates for public or political office for the purpose of winning or keeping business. The UKBA also prohibits any payment or gift to commercial entities for the purpose of winning or keeping business.

In short, anti-corruption means no acceptance or payment of:

- Anything of value provided for the purpose of winning or keeping business
- Any form of bribe or kickback

## **Human Rights**

Peraton expects its Suppliers to support and respect the protection of internationally proclaimed human rights and to ensure that they are not complicit in human rights abuses, as defined by law or otherwise identified by international human rights organization and conventions.

*Harassment, Harsh or Inhumane Treatment:* Peraton expects its Suppliers to create and maintain an environment that treats all employees with dignity and respect and that Suppliers will not engage in any threats of violence, sexual exploitation or abuse, verbal or psychological harassment or abuse in the conduct of its business. No harsh or inhumane treatment, coercion or corporal punishment of any kind is to be tolerated by a Supplier in the conduct of its business.

*Health and Safety:* Peraton expects its Suppliers to follow all applicable laws and regulations and provide a safe and healthy workplace for all personnel. This includes mitigating actual as well as potential health and safety risks at work. Suppliers should provide the same standard of health and safety in any housing that they provide for their employees or contractors. At a minimum, Suppliers should strive to implement recognized workplace systems, procedures and controls for the health and safety of all personnel in compliance with nationally and internationally recognized standards.

*Wages and Benefits:* Peraton expects its Suppliers to comply with all applicable wage and hour laws and regulations, including those relating to minimum wages, overtime hours, piece rates and other elements of compensation, and provide legally mandated benefits.

*Working Hours:* Peraton expects its Suppliers will not exceed prevailing local work hours and will appropriately compensate overtime.

*Conflict Minerals:* Suppliers must adhere to federal laws and regulations requiring reporting companies to make specialized disclosure and conduct due diligence concerning their use of conflict minerals that may have originated in the Democratic Republic of the Congo (DRC) or an adjoining country. Conflict minerals include cassiterite, columbite-tantalite, gold and wolframite, or their derivatives (tantalum, tin, and tungsten). We expect our suppliers to develop due diligence processes to meet our obligations to ensure that all products are responsibly manufactured.

## **Anti-Human Trafficking**

Peraton is committed to taking action against human trafficking, child labor and forced labor in our operations. Suppliers are prohibited from engaging in the trafficking in persons, which includes but is not limited to the illegal movement of people, trafficking in persons, sexual exploitation, and the use of forced or child labor of any form. Suppliers must adhere to regulations prohibiting human trafficking and comply with all applicable local laws in the country or countries in which they operate. Suppliers must refrain from violating the rights of others and address any adverse human rights impacts of their operations.

Suppliers must educate employees on prohibited trafficking activities, discipline employees found to have violated the law or rules and notify the contracting officer of violations and action taken against employees. Specifically, suppliers will be prohibited from the following in all contracts.

- Destroying, concealing, or confiscating identity or immigration documents;
- Using misleading or fraudulent tactics in recruiting;
- Charging employee recruitment fees or providing inadequate housing based on local standards, laws and directives;
- Failing to provide employment contracts and other documentation in the employee's native language;
- Failing to provide return transportation upon the end of employment for employees brought to the country for the purpose of working on a U.S. government contract or subcontract; and
- Failing to interview and protect employees suspected of being trafficking victims.

## **Environment**

Suppliers are expected to implement a responsible environmental policy in accordance with all applicable local, national, and global environmental laws, such as requirements around greenhouse gas emissions, chemical and use of hazardous materials, waste management and disposal, recycling, industrial wastewater treatment and discharge, air emissions controls, environmental permits, and environmental reporting.

## **Conflicts of interest**

Suppliers must always make decisions in the best interest of Peraton and **based on the contract with their employer** when conducting Peraton business. Suppliers may not receive any personal profit or advantage, other than their compensation from their employer, in connection with any transaction involving Peraton.

Suppliers must not engage in:

- Any activity that would present a conflict of interest related to their employer and/or Peraton
- Any activity that could be perceived as a potential conflict of interest related to their employer and/or Peraton

## **Business gifts and entertainment**

Suppliers may not provide or receive business amenities (gifts, meals, services, entertainment, or anything else of value) when doing so creates the appearance of impropriety or undue influence. This



restriction applies to amenities given to or received from representatives of Peraton, or its current or potential customers, channel partners, suppliers, other business partners or competitors.

### **Business with family or friends**

During their Peraton assignment, Suppliers must disclose to their employer and Peraton all situations where they may be conducting business with members of their family, friends, or others with whom they have a close personal relationship.

### **Use of Peraton resources**

Any use of Peraton assets, resources, or equipment, including the company's computers and information systems, must be solely for Peraton business purposes and must be consistent with all Peraton policies and guidelines. Suppliers may not use any Peraton resource in violation of law and must not allow other people, including friends and family, to use Peraton resources. Suppliers should avoid any usage that might lead to loss or damage, including the introduction of viruses or a breach of Peraton's IT security. Theft or unauthorized possession or use of Peraton assets is prohibited.

Peraton resources may not be used to create, transmit, store, copy, or display messages, images or materials that are:

- For personal gain
- Solicitations
- Chain letters
- Threatening, pornographic, sexually explicit, harassing, demeaning or otherwise offensive

Peraton may, as allowed by applicable local laws, access and inspect all Peraton resources that Suppliers may use, including Peraton computers, servers and systems, telephones, voicemail and email systems, desks, lockers, cabinets, vehicles, and other equipment belonging to Peraton. For reasons related to safety, supervision, security, and other concerns, Peraton may inspect persons and property on Peraton premises at any time and without notice, as allowed by applicable local laws. Suppliers should not have any expectation of personal privacy in any messages or records created, transmitted, or stored by means of Peraton systems. Peraton owns all business emails, voicemails and any other non-personal data of any kind stored on or transmitted by Peraton equipment. As allowed by applicable local law, Peraton may access or retrieve such data at any time.

### **Confidentiality**

Suppliers are expected to be familiar with and adhere to any specific confidentiality terms agreed to between their employer and Peraton. If a separate confidentiality agreement does not exist, Suppliers must presume that all information made available to them in conducting Peraton business is confidential. This includes information that Peraton may have received from its suppliers, customers, or business partners. Confidential information may only be used or disclosed for valid business purposes. Suppliers must understand and follow Peraton's policies for the use of social media, including user forums, blogs, chat rooms, and bulletin boards, and must never discuss Peraton intellectual property, trade secrets, and other company confidential information on social media.

### **Third-party confidential information**

- Former employers: Suppliers are expected to honor any valid disclosure or use restrictions on confidential information of their current or former employers. Such information in any tangible or readable form must not be brought onto Peraton premises without the prior written consent of such former employers.
- Competitors: Suppliers must not request, accept, use, or share confidential information of Peraton's competitors.
- Other third parties: Suppliers must not disclose confidential information of customers, business partners, or suppliers, including non-public pricing information.



- Suppliers must never induce anyone to violate any obligation of confidentiality.

### **Working in other countries**

When a Supplier is conducting Peraton business outside his or her resident country, the Supplier comply with immigration laws, and obtain proper authorizations (including work permits and visas), in each country in which they conduct business or perform work.

### **Records**

All records created in conducting Peraton business must be complete and accurate, and must be retained, protected, and disposed of according to Peraton policy. All payments made on behalf of Peraton must be properly documented. Suppliers must not enter into any side letters or side agreements or establish any undisclosed or unrecorded Peraton fund or asset for any purpose. Records include email and other communications, and Suppliers should avoid exaggeration, derogatory language, and other expressions that could be taken out of context.

### **Gray marketing**

Suppliers must use due diligence in preventing situations that may lead to the gray marketing of Peraton products. Gray marketing is the trade of product through distribution channels that are unofficial, unauthorized, or unintended by Peraton. Suppliers must promptly report any suspected gray marketing activity to their employer, as well as to the Peraton Ethics and Compliance Office.

### **Global trade compliance**

Suppliers must understand and follow Peraton's policies and procedures on Global Trade and must ensure Peraton's products, services, and technology are not imported, exported, or transferred in violation of applicable law.

### **Insider trading**

Suppliers may, at times, have access to material non-public information, which is information concerning Peraton's business that a reasonable investor would consider important in deciding whether to buy, sell, or hold securities—and that information has not been released to the public. Trading stock, or causing stock to be traded, on the basis of material non-public information, regardless of the size of the trade or where the trader is located, is a violation of U.S. securities laws and, depending on the circumstances, the laws of other countries. Anyone who violates these laws may be subject to severe civil and criminal sanctions.

### **Discussions with press or media**

Suppliers are not authorized to speak to the media on behalf of Peraton. All communications with the media regarding Peraton business must first be approved by Peraton Corporate Communications & Engagement. If you are contacted by a member of the news media, refer them directly to Lynelle Haugabrook, Communications Specialist: [lhaugab@peraton.com](mailto:lhaugab@peraton.com).

### **Privacy**

Suppliers must follow Peraton privacy policies and data protection practices when conducting Peraton business and in using online and offline systems, processes, products, and services that involve the use, storage, or transmission of any personally identifiable data from Peraton customers, business partners, employees and other individuals. Personal information includes data related to a person who can be identified or located by that data.



## **Non-solicitation**

Suppliers may not solicit any Peraton employee during the Peraton employee's working time for purposes not related to their Peraton engagement. Suppliers may not distribute literature or other materials in Peraton working areas or solicit or hand out materials for any reason not related to their Peraton engagement, including for charitable purposes.

## **Cooperation with investigations and audits**

Suppliers must cooperate with all Peraton internal investigations and audits. Suppliers must not destroy or alter any records, and should not discuss an internal investigation with anyone, inside or outside Peraton, unless permitted to do so by the internal investigators or in communicating with government agencies in compliance with local law.

## **Additional principles**

This Supplier Code of Conduct must be read and adhered to in conjunction with the applicable code of conduct and policies (if any) of the Supplier's employer. In addition, the requirements set out above are not all-inclusive. Any conduct that could raise questions about Peraton's commitment to the highest standards of business ethics and compliance is prohibited. Suppliers with questions concerning this Supplier Code of Conduct should contact their employer, a member of Peraton's management or Peraton's Ethics and Business Conduct Team ([ethics@Peraton.com](mailto:ethics@Peraton.com)).

## **Reporting violations**

Suppliers have an obligation to report any alleged misconduct immediately, including misconduct by employees, clients, contractors, partners, and other Suppliers. Suppliers should always act honestly and in good faith, and in a respectful manner when raising concerns related to or otherwise using this Supplier Code of Conduct.

Suppliers should make reports to their management chain, Peraton management or Peraton's Ethics and Compliance Office. Peraton does not tolerate retaliation against anyone who raises a concern honestly and in good faith.

Peraton's Ethics and Business Conduct Team can be reached as follows:

E-mail: [ethics@peraton.com](mailto:ethics@peraton.com).

Telephone: Peraton Ethics and Business Conduct Team at: 1-844.800.3721

File a report online: [www.Peraton.ethicspoint.com](http://www.Peraton.ethicspoint.com).

The Ethics Helpline and website, maintained by EthicsPoint, are available 24 hours a day, 365 days a year. Anonymous reports may be made through the Ethics Helpline or the EthicsPoint website.