

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, regulations, and contract provisions applicable to the work they are performing on behalf of Peraton.

Ethics and compliance program

Suppliers must maintain an effective ethics and compliance program that aligns to the size and nature of their business, including policies and processes to ensure compliance with laws, regulations, and the expectations set forth within this Code. Suppliers are expected to administer systems and controls to monitor their compliance with these standards and take appropriate actions to timely address and correct identified deficiencies or incidences of noncompliance.

Respect, dignity, and equal opportunity

Peraton expects our Suppliers to treat people with respect and dignity, promote equal opportunity for all, and maintain an inclusive and ethical culture. Suppliers are required to provide equal employment opportunity to all employees and applicants for employment, without unlawful discrimination, and maintain an employment environment that is free from physical and verbal harassment or other abusive conduct.

Workplace health and safety

Suppliers must protect the health, safety, and welfare of their employees, visitors, and others who may be affected by their work and business operations. Suppliers are required to maintain safe, healthy, and humane working conditions; comply with all applicable health and safety laws and regulations; and maintain a workplace free from the illegal use, possession, sale, or distribution of controlled substances.

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 promotes and complies with all applicable human rights laws and standards and expects the same commitment from its Suppliers.

Combating Human Trafficking: Peraton is committed to supporting the global elimination of human trafficking and slavery. Accordingly, Suppliers are required to:

- Ensure all employment is freely chosen and prohibit all forms of slavery and human trafficking.
- Ensure that child labor is not used in the performance of work.
- Comply with all applicable regulations prohibiting human trafficking and forced labor.
- Pay workers at least the minimum wages and compensation required by local law and provide all legally mandated benefits. In addition to payment for regular hours, workers must be paid for overtime at the premium rate legally required.
- Respect the rights of workers to associate freely and communicate openly with management regarding working conditions without fear of harassment, or retaliation.
- Comply with all contractual clauses and applicable local laws in the country or countries in which they operate.

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.

Work Authorizations: Suppliers must comply with immigration laws and obtain proper authorizations (including work permits and visas), in each country in which they conduct business or perform work.

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 Suppliers to develop due diligence processes to meet our obligations to ensure that all products are responsibly manufactured.

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 must 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.

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 Compliance Office (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 Compliance Office can be reached as follows:

E-mail: ethics@peraton.com.

Ethics Helpline: 1.844.800.3721 File a report online: 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.