



STR's Supplier Code of Conduct

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Revision History

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Preface

At STR, we are committed to complying with all laws and regulations, ensuring fair competition, upholding the highest standards in all our business dealings with our partners, customers, and the U.S. government, protecting taxpayer resources, and providing high-quality services and products for our customer communities in U.S. Intelligence, Armed Forces and their allies. We require our suppliers to share this commitment in all business dealings with STR.

We stand firmly behind our Values to guide us in our daily operations and relationships:

Impact: We harness technology to solve important national security problems.

- Upholding the highest ethical and conduct integrity is essential to our value of Impact, enabling us to deliver high quality services and solutions, technology breakthroughs, and thrusts that improve national security.

Craftsmanship: We commit ourselves to excellence in everything we do.

- Compliance to security, information assurance and cybersecurity, financial, environmental, safety, labor, and other regulatory and legal requirements is vital to our value of Craftsmanship so that we can focus on creating solutions that advance the state of the art within the time and budget constraints that we and our customers operate under.

Teamwork: We prioritize relationships across STR and with our partners to deliver capabilities.

- Working collaboratively and respectfully together with our partners, customers, and other stakeholders is critical to our value of Teamwork to build an inclusive workspace that ensures our customers get the best solutions and so our customers and partners want to work with us again and again.

These simple yet essential values ensure that we conduct ourselves with the utmost integrity, following all applicable laws, regulations, and standards of business conduct, and avoiding even the appearance of impropriety. It's what our customers expect and require of us and what we expect of ourselves.

This Supplier Code of Conduct expresses the expectations we hold for our suppliers and mirrors the standards we set for our own employees, board of directors and other business associates.

Thank you for your shared commitment to meeting these principles.



1. OUR SUPPLIER CODE OF CONDUCT

This Supplier Code of Conduct is aligned with the recommendations of the Defense Industry Initiative (DII) on Business Ethics & Conduct and sets forth our expectation that suppliers will:

- Conduct business ethically in compliance with all applicable local, state, and U.S. laws and regulations and those of the countries in which our suppliers operate.
- Support the human rights of workers.
- Treat people with respect.
- Maintain safe and healthy working conditions.
- Safeguard assets entrusted to them.
- Strive to protect the environment.

We expect our suppliers to maintain full compliance with this Supplier Code of Conduct and all laws and regulations applicable to their business and to ensure extension of these requirements to all sub-tier suppliers they employ on our behalf. When conducting international business, or if their primary place of business is outside the United States, suppliers must comply with local laws and regulations. For the purposes of this Supplier Code of Conduct, “Supplier” is defined as any third party that directly or indirectly sells, or seeks to sell, any kind of goods or services to our company or on our company’s behalf, including suppliers, contractors, subcontractors, distributors, dealers, sales/marketing representatives, intermediaries, agents, partners, consultants, resellers, systems integrators, or similar entities. This Supplier Code of Conduct is in no way intended to conflict with or modify the terms and conditions of any existing contract. In the event of a conflict, suppliers must first adhere to applicable laws and regulations, then the contract terms, followed by this Supplier Code of Conduct. If local law is not as strict as this Supplier Code of Conduct, we require our suppliers to comply with this Supplier Code of Conduct.

In the event of a violation of any of the expectations identified in this Supplier Code of Conduct, we may pursue corrective action to remedy the situation. In the case of a violation of law or regulation, we may be required to report those violations to the proper authorities. We reserve the right to terminate our relationship with any supplier under the terms of the existing procurement/purchasing contract.

The Supplier Code of Conduct can be found on STR’s website at <https://www.str.us>. If you have any questions regarding the content of this Supplier Code of Conduct, please contact us as indicated in the [Resources section](#) of this document.



2. GOVERNANCE AND COMPLIANCE

We expect our suppliers to operate ethically and consistent with all laws and regulations that may require a Code of Business Ethics and Conduct including an Ethics and Compliance Program that is commensurate with the size and nature of their business. All suppliers, large and small, must have mechanisms to ensure compliance with laws, regulations, and the expectations related to or addressed expressly within this Supplier Code of Conduct. This should include methods to monitor their compliance with these standards and take appropriate action to correct identified deficiencies or incidences of noncompliance.

2.1 Conduct Business in Compliance with Laws and Regulations

We also encourage our suppliers to be familiar with the business practices of their suppliers, subcontractors, and other business partners to ensure compliance with the law and this Supplier Code of Conduct for any activity performed on behalf of our company; and to proactively manage and mitigate risk in their supply chain and, where appropriate, report risk back to us when risks are discovered with the steps the supplier is taking to ensure that those risks are appropriately mitigated.

2.2 Fraud and Deception

Suppliers must not engage in fraud, deception, or misleading conduct. We require suppliers to act with integrity and transparency in all dealings and interactions with STR and other parties. If suppliers discover that a false or misleading statement or omission has been made, whether intentional or inadvertent, they must take immediate steps to identify the inaccurate statement and provide accurate information. These obligations encompass all aspects of suppliers' business, including and especially any matters that relate to the safety or regulatory compliance of suppliers' products or services.

2.3 Anti-Corruption and Improper Payments

Our Suppliers must comply with the anti-corruption laws, directives, and regulations that govern operations in the countries in which they do business, regardless of local customs, including the U.S. Foreign Corrupt Practices Act. We expect suppliers to conduct due diligence to prevent and detect bribery and corruption in all business arrangements, including partnerships, the engagement of contractors and sub-contractors, joint ventures, offset agreements, and hiring of third-party intermediaries, such as agents or consultants.

Suppliers must not offer, directly or indirectly, any illegal or improper payments to, or agree to receive any illegal or improper payments from, any customer, supplier, their



agents, representatives, or others. We expect suppliers to prohibit their employees from receiving, paying, and/or promising sums of money or anything of value, directly or indirectly, intended to exert undue influence or improper advantage. This prohibition applies even in locations where such activity may not violate local law or custom. This includes refraining from offering or making any payments of money or anything of value (including kickbacks, favors, gifts, gratuities, entertainment, travel, political contributions, charitable donations or other business courtesies) to customers, government officials, political parties, candidates for public office, charities, or other business-related parties that could be considered to improperly influence a business decision. This also includes a prohibition on so-called “facilitation” or “grease” payments intended to expedite or secure performance of a routine governmental action, such as obtaining a visa or customs clearance, unless there is a formal legal governmental fee schedule for such expediting services and the government provides receipts.

2.4 Conflicts of Interest and Business Courtesies

Conflicts of interest can arise when personal interests interfere or appear to interfere with a person’s ability to make objective business decisions or perform their duties without bias. This applies to a conflict between the interests of our company and the personal interests of those working on our behalf, or their close relatives, friends, or associates.

We expect suppliers to avoid all conflicts of interest or situations that give rise to the appearance of a potential conflict of interest. Suppliers must provide immediate notification to all affected parties in the event that an actual or potential conflict of interest arises. This includes a conflict between STR’s interests and the interests of a supplier or a supplier’s employees.

Suppliers must not use the exchange of business courtesies to gain an unfair competitive advantage. STR prohibits employees from accepting gifts from any party that STR may have or could expect to have a business relationship. We expect suppliers to avoid offering our customers, employees and representatives any gift or hospitality that is. No cash gifts or cash equivalent should be offered or accepted.

2.5 Anti-Retaliation and Whistleblower Protection

We expect our suppliers to provide their employees with avenues for raising legal or ethical issues or concerns without fear of retaliation. We expect our suppliers to take action to prevent, detect, and correct any retaliatory actions.

Suppliers may also ask questions or raise concerns directly to our company as indicated in the [Resources section](#) of this Supplier Code of Conduct. We prohibit retaliation against



anyone for raising a concern in good faith or for participating in an investigation of possible wrongdoing.

2.6 Fair Competition

Suppliers must compete on the merits of their products and services rather than by any illegal or unethical business practice.

This means we expect our suppliers to comply with competition and antitrust laws and never make agreements with competitors to fix prices, rig bids, allocate customers or markets, or exchange any pricing information.

2.7 Imports and Exports

Our suppliers must comply with the laws, directives and regulations that govern international trade, including those that govern the import and export of parts, components, software, technical services, and technical data such as the International Traffic in Arms Regulation and the Export Administration Regulations. Suppliers shall provide truthful, accurate, and complete information and obtain any necessary authorizations, export licenses and/or consents, where necessary.

2.8 Taxes

Suppliers must ensure they comply with all applicable tax laws and regulations in the countries where they operate and be open and transparent with the tax authorities. Under no circumstances should suppliers engage in deliberate illegal tax evasion or facilitate such evasion on behalf of STR or others.

2.9 Anti-Boycott, Sanctions and Embargoes

Our suppliers must not participate in, cooperate with, or further the cause of any unsanctioned foreign economic boycott or restrictive trade practice, in accordance with the Export Control Reform Act of 2018 and the 1976 Tax Reform Act.

Suppliers must ensure that their business practices are in accordance with all applicable laws, directives, and regulations governing embargoes, sanctions, economic sanctions, and sanctions that may curtail the transfer of parts, components, and technical data and services to third parties. Suppliers must provide accurate and complete information and obtain authorizations where necessary.



2.10 Anti-Money Laundering

Our suppliers must also comply with anti-money laundering laws and regulations. Suppliers must not engage with any entity or in any activity that would involve our company in money-laundering schemes.

2.11 Intellectual Property

We require our suppliers to comply with the laws governing intellectual property rights assertions, including protection against disclosure, patents, copyrights, and trademarks.

2.12 Environmental Protection

We require our suppliers to join us in protecting the environment. This means we expect our suppliers to operate in a manner that actively manages and mitigates environmental hazard risk to include compliance to environmental regulations and embodies responsible environmental stewardship.

2.13 Accurate Records

We expect suppliers to be honest and transparent and to create and maintain complete and accurate records for all transactions and business processes related to our company's business, including those for timekeeping and invoicing purposes. All records, regardless of format, made or received in furtherance of a business transaction must fully and accurately represent the transaction or event being documented. Suppliers must not alter any record to conceal or misrepresent the underlying transaction represented by it. Records should be retained based on the applicable records retention requirements.

2.14 Responsible Sourcing

Suppliers must adhere to federal laws and regulations regarding conflict minerals (gold, tantalum, tin, and tungsten) when sourcing materials. U.S. stock-listed companies who manufacture or contract to manufacture products containing conflict minerals must make specialized disclosure and file reports as required by the U.S. Securities and Exchange Commission.

This means we expect our suppliers whose products contain these minerals to:

- Conduct due diligence on the source and chain of custody of these minerals; and
- Support efforts to eradicate the use of conflict minerals which directly or indirectly finance, or benefit armed groups in the Democratic Republic of Congo or adjoining countries.



2.15 Quality

Suppliers must take due care to ensure their work product meets our company's quality standards.

This means we expect our suppliers to have effective processes in place to:

- Identify defects and implement corrective actions, and to facilitate the delivery of a product whose quality meets or exceeds the contract requirements.
- Minimize the risk of introducing counterfeit parts and materials into deliverable products.
- Detect counterfeit parts and materials, provide notification to recipients of counterfeit product(s) when warranted, and exclude them from the delivered product.



3. PEOPLE

3.1 Human Rights

We expect our suppliers to share our commitment to uphold the human rights of all workers. This means we expect suppliers to:

- Ensure all employment is freely chosen and prohibit all forms of modern slavery and human trafficking;
- Prohibit the use of child labor or labor by anyone under the minimum legal age for employment where the work is performed;
- Comply with all applicable laws in the states and countries in which they operate, including those related to wages, benefits and working hours;
- Provide their employees with written terms in a language that the employee understands clearly indicating their rights and responsibilities with regard to wages, working hours, benefits, and other working and employment conditions;
- Respect the right of workers to form and join trade unions of their own choosing, to bargain collectively and to engage in peaceful assembly, as well as respect the right of workers to refrain from such activities;
- Refrain from violating the human rights of others;
- Never destroy, conceal, confiscate, or otherwise deny access to any form of employee identification (e.g., passports or work permits) as a condition of employment;
- Never use recruiters that do not comply with local labor laws of the country in which the recruiting takes place and never use misleading or fraudulent tactics in recruiting;
- Never charge employees with recruitment fees or provide inadequate housing based on local standards, laws and directives; and
- Never fail to investigate and protect employees suspected of being trafficking victims.

3.2 Health and Workplace Safety

We expect suppliers to maintain a safe, healthy, and humane working environment to ensure compliance with all applicable safety and health laws and regulations for the welfare of all employees, contractors, visitors, and others who may be affected by the supplier's activities and to strive to eliminate fatalities, work-related injuries, and exposure of individuals to safety hazards. Consistent with applicable laws and regulations, suppliers must ensure that each employee's performance and safety is not impaired by alcohol, controlled substances, or drugs, whether legal or illegal. Suppliers must maintain a workplace free from the illegal use, possession, sale or distribution of controlled substances.



3.3 Respect and Equal Employment Opportunity

We expect our suppliers to treat all people with respect and dignity, promote equal and fair opportunity for all, and comply with all non-discrimination laws and regulations. Suppliers must ensure employment, including hiring, payment, benefits, advancement, termination, and retirement, is based on ability and not any personal characteristics.

STR values the differences that make people unique, we remain open and receptive to different ideas and opinions, and we provide a work environment free from all forms of harassment or other abusive conduct. We expect the same of our suppliers.



4. SAFEGUARDING ASSETS AND INFORMATION

STR relies on our suppliers to protect both the STR assets that we have entrusted to them and any Customer assets and information that may be entrusted to the supplier by STR, against unauthorized access, loss, damage, theft and misuse, and to only use them in a manner that is permitted under our contract. This includes both physical assets and data.

4.1 Use of STR Assets and Facilities

If part of STR's contractual agreement with the Supplier contemplates use of STR corporate information technology (IT) assets, STR facilities, or STR-furnished property, STR requires the Supplier to follow STR's prescribed policies and procedures for Acceptable Use and safeguarding of the resources furnished to the Supplier. Questions on the policies and procedures should be directed as indicated in the [Resources section](#) of this Supplier Code of Conduct.

4.2 Data Protection

We require our suppliers to protect company proprietary and trade secret information that we have entrusted to them, against unauthorized access, loss, damage, theft and misuse, and to only use them in a manner that is permitted under our contract.

Suppliers must comply with the applicable data privacy laws on the collection, processing, and transfer of personal data and information.

We expect suppliers to understand the cybersecurity landscape, including requirements from STR, the U.S. Government, and governments worldwide. To protect both commercial and defense related businesses and support our mission, STR has adopted security principles in accordance with the National Institute of Standards and Technology (NIST) Cybersecurity Framework and expects similar efforts from suppliers to adequately protect the supply chain. We expect suppliers to adopt security practices in accordance with an industry-leading security framework designed to mitigate cybersecurity risks and adequately protect their information systems from unauthorized access, destruction, manipulation, use, modification, and disclosure. Suppliers must ensure that products delivered to STR satisfy relevant cyber-related regulations for product safety, airworthiness, and quality, and are free from cyber risks. Suppliers must promptly inform us of any unauthorized use of these assets or potential unauthorized access or compromise of its systems or data.



5. RESOURCES

STR appreciates our Suppliers' commitments to the principles included in this Supplier Code of Conduct. To speak up, seek guidance, or report concerns, Suppliers may contact STR's Ethics organization via email: STR-Ethics@str.us, by calling our Hotline: (833) 222-5049, or via the confidential and anonymous reporting system <https://str.ethicspoint.com/>