



SYSTEMS & TECHNOLOGY RESEARCH LLC

Supplier Code of Conduct

At Systems & Technology Research (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.

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

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

Teamwork: we build trusted, collaborative relationships to deliver capability.

Overview

This Supplier Code of Conduct is aligned with the recommendations of the Defense Industry Initiative (DII) on Business Ethics & Conduct and sets forth STR's expectation that suppliers will conduct business ethically and in compliance with applicable law; support the human rights of workers; treat people with respect; maintain safe and healthy working conditions; safeguard assets entrusted to them; and strive to protect the environment.

"Supplier" means any third party that directly or indirectly sells, or seeks to sell, goods or services to STR or on STR's behalf — including contractors, subcontractors, distributors, dealers, sales/marketing representatives, agents, consultants, resellers, and systems integrators, at every tier. Suppliers must comply with this Code and all applicable laws and regulations, and must flow these requirements down to their own sub-tier suppliers.

If a contract conflicts with this Code, suppliers must follow applicable law first, then the contract, then this Code; if local law is weaker than this Code, we require suppliers to meet this Code's standard. We may pursue corrective action, required legal reporting, or termination of the business relationship for violations of this Code.

This Supplier Code of Conduct is available at www.str.us. Questions about its content, or concerns about a possible violation, should go to the contacts at the end of this document.

01 ETHICS & COMPLIANCE PROGRAM

Suppliers must maintain an ethics and compliance program commensurate with the size and nature of their business — including a written code of conduct, visible leadership commitment, periodic risk assessment (including risk in the supplier's own supply chain), confidential reporting channels, prompt investigation of concerns, employee training, and consistent consequences for violations.

Suppliers performing on covered U.S. Government contracts or subcontracts must also meet FAR 52.203-13 — a written code, a compliance training program, an internal reporting mechanism, and timely disclosure of credible violations to the Government — and must flow this requirement down to their own subcontractors.

02 CODES OF CONDUCT AND SUB-TIER SUPPLIERS

Suppliers should maintain their own code of business conduct and compliance systems, and must extend the expectations of this Code to their own subcontractors, distributors, agents, and other sub-tier suppliers performing work on STR's behalf, at every tier.

03 COMPLIANCE WITH LAWS

Suppliers must comply with all applicable local, state, federal, and international laws and regulations governing their business and their work for STR.

04 RAISING CONCERNS & ANONYMOUS REPORTING

Suppliers must give their employees confidential — and, where permitted by law, anonymous — channels to ask questions or raise legal or ethical concerns. Suppliers who become aware of misconduct involving STR's business should promptly notify STR's Ethics organization (see Resources, at the end of this document).

05 NON-RETALIATION

STR prohibits retaliation against anyone who raises a concern in good faith or participates in an investigation of possible wrongdoing. Suppliers must take steps to prevent, detect, and correct any retaliatory conduct against their own employees.

06 HUMAN RIGHTS & LABOR

We expect our suppliers to share our commitment to uphold the human rights of all workers. Suppliers must:

- Ensure all employment is freely chosen and comply with all applicable wage, benefit, and working-hour laws;
- Provide employees with written employment terms in a language they understand;
- Respect workers' right to freedom of association and collective bargaining;

- Never confiscate worker identity or travel documents as a condition of employment; and
- Never use recruiters that charge employees recruitment fees or use misleading or fraudulent recruiting tactics.

07 CHILD LABOR

Suppliers must prohibit the use of child labor or labor by anyone under the minimum legal age for employment where the work is performed.

08 HUMAN TRAFFICKING

Suppliers must prohibit all forms of forced, bonded, or trafficked labor, and must investigate and protect any employee suspected of being a trafficking victim.

For an employee a supplier brings into a country specifically to work on a U.S. Government contract or subcontract, the supplier must provide return transportation at the end of employment at no cost to the employee, and, where required by law or contract, maintain a trafficking compliance plan, train employees on the prohibition against trafficking, and promptly notify the appropriate contracting officer of any credible information regarding a violation.

09 WAGES & BENEFITS

Suppliers must pay workers at least the legally required minimum wage, provide legally mandated benefits, and compensate overtime at the applicable legal rate.

10 ENVIRONMENTAL, HEALTH & SAFETY

Suppliers must comply with applicable environmental, health, and safety laws, regulations, and permits; maintain a safe, healthy working environment for employees, contractors, and visitors; and operate in a manner that actively manages and mitigates environmental risk and embodies responsible environmental stewardship.

Suppliers must also maintain a workplace free from threats, intimidation, and violence, and must respond promptly and appropriately to any such conduct.

11 SUBSTANCE ABUSE

Suppliers must maintain a workplace free from the illegal use, possession, sale, or distribution of controlled substances, and must ensure that employee performance and safety are not impaired by alcohol, controlled substances, or drugs, whether legal or illegal.

12 NON-DISCRIMINATION

Suppliers must provide equal employment opportunity and base hiring, pay, advancement, and termination decisions on ability rather than personal characteristics, consistent with applicable non-discrimination laws.

Suppliers performing on U.S. federal contracts must also comply with applicable federal equal employment opportunity and affirmative-action requirements, including protections for individuals with disabilities and protected veterans.

13 HARASSMENT

Suppliers must provide a workplace free from harassment or other abusive conduct, and must treat all employees with respect and dignity.

14 CONFLICTS OF INTEREST

Suppliers must avoid, and immediately disclose to all affected parties, any actual or potential conflict between their interests (or those of their employees) and STR's interests. Business courtesies exchanged with STR employees or representatives must be modest and must never include cash or cash equivalents.

Suppliers supporting STR's U.S. Government contracts must also identify and disclose any organizational conflict of interest (OCI) — a conflict that could impair the supplier's objectivity or create an unfair competitive advantage — and must cooperate with STR to resolve or mitigate it.

15 ANTI-CORRUPTION & IMPROPER PAYMENTS

Suppliers must not offer, pay, or accept bribes, kickbacks, or other improper payments intended to influence a business decision, and must conduct due diligence to prevent and detect corruption in partnerships, joint ventures, and engagements of agents or consultants. So-called "grease" or facilitation payments are prohibited unless a formal government fee schedule applies and a receipt is provided.

Suppliers must comply with the U.S. Foreign Corrupt Practices Act, the UK Bribery Act, and the U.S. Anti-Kickback Act, as applicable.

16 FAIR COMPETITION & ANTITRUST

Suppliers must compete on the merits of their products and services and must never agree with competitors to fix prices, rig bids, allocate customers or markets, or exchange competitively sensitive information.

17 INTERNATIONAL TRADE COMPLIANCE

Suppliers must comply with the laws governing the import and export of parts, components, software, technical services, and technical data, including the International Traffic in Arms Regulations and the Export Administration Regulations, and must obtain any required export licenses or authorizations.

Suppliers must comply with U.S. economic sanctions and embargoes administered by the Department of the Treasury's Office of Foreign Assets Control (OFAC), and must not participate in unsanctioned foreign boycotts or restrictive trade practices.

18 ANTI-MONEY LAUNDERING

Suppliers must comply with applicable anti-money-laundering laws and must not engage in, or allow their business to be used to facilitate, money-laundering activity.

19 TAXES

Suppliers must comply with all applicable tax laws and be open and transparent with tax authorities. Deliberate tax evasion, or facilitating evasion on STR's or others' behalf, is prohibited.

20 RESPONSIBLE SOURCING — CONFLICT MINERALS

Suppliers whose products contain tin, tantalum, tungsten, or gold must conduct due diligence on the source and chain of custody of these minerals, and must support efforts to keep conflict minerals from financing or benefiting armed groups in the Democratic Republic of the Congo or adjoining countries.

21 SUPPLY CHAIN SECURITY & PROHIBITED SOURCES

Suppliers must comply with restrictions on covered telecommunications and video-surveillance equipment and services under Section 889 of the FY2019 National Defense Authorization Act, including performing reasonable inquiry, providing required representations, and promptly notifying STR if covered equipment or services are identified anywhere in their supply chain.

Suppliers must comply with applicable exclusion and removal orders issued under the Federal Acquisition Supply Chain Security Act (FASCSA), monitor emerging restrictions affecting sources of concern, and flow these requirements down to their sub-tier suppliers.

22 PRODUCT QUALITY & COUNTERFEIT PARTS

Suppliers must maintain effective processes to identify and correct defects, deliver products and services that meet or exceed contract requirements, and minimize the risk of introducing counterfeit parts or materials into deliverable products.

Suppliers must detect counterfeit parts and materials, notify recipients when warranted, and exclude them from delivered products, consistent with applicable counterfeit-parts detection and avoidance requirements, including DFARS 252.246-7007 where applicable.

23 ACCURATE RECORDS & SUBMISSIONS

Suppliers must create and maintain complete, accurate records for all transactions related to STR's business, including timekeeping and invoicing,

and must never alter, conceal, or destroy records to misrepresent a transaction — including in anticipation of, or in response to, an audit or investigation.

When supporting STR's U.S. Government contracts, suppliers must accurately allocate time and costs to the correct contract, ensure that amounts billed to the Government are allowable and adequately supported, and provide only certifications and representations that are accurate, complete, and current.

24 GOVERNMENT CONTRACTING REQUIREMENTS

Suppliers supporting STR's work on U.S. Government contracts must:

- Protect procurement integrity — never seek, obtain, or use another party's proposal or source-selection information without authorization;
- Comply with applicable rules and required waiting periods governing the hiring of current and former Government and military personnel;
- Comply with restrictions on gifts, gratuities, meals, or entertainment provided to U.S. Government employees;
- Provide accurate cost or pricing data and comply with applicable Government cost-accounting and pricing rules;
- Cooperate fully with authorized Government and STR audits, reviews, and investigations, and never alter, conceal, or destroy records in anticipation of, or in response to, such activity; and
- Promptly report to STR any suspected violation of this Code, the applicable contract, or applicable law in connection with Government work.

25 INFORMATION PROTECTION & INTELLECTUAL PROPERTY

Suppliers must protect STR's and STR's customers' trade secrets, proprietary information, and confidential information against unauthorized access, loss, damage, theft, or misuse, and use it only for the purpose for which it was shared. Suppliers must respect patents, copyrights, trademarks, and other intellectual property rights, and must comply with applicable data-privacy laws governing the collection, processing, and transfer of personal information.

26 CYBERSECURITY & CONTROLLED INFORMATION

Suppliers must adopt security practices consistent with an industry-leading cybersecurity framework — such as the NIST Cybersecurity Framework — to protect their information systems from unauthorized access, destruction, manipulation, or disclosure, and must promptly report any unauthorized access to, or compromise of, STR data or systems.

Suppliers that handle Federal Contract Information (FCI) or Controlled Unclassified Information (CUI) on STR's behalf must comply with DFARS 252.204-7012 and the security requirements of NIST SP 800-171, must obtain and maintain the level of Cybersecurity Maturity Model Certification (CMMC) required by their contract, and must flow these requirements down to sub-tier suppliers that will handle FCI or CUI.

27 INSIDER TRADING

Suppliers must never use material, nonpublic information obtained through their relationship with STR to trade in STR's or any other company's securities, or to enable others to do so.

28 RESPONSIBLE USE OF ARTIFICIAL INTELLIGENCE

Suppliers who use artificial intelligence (AI) tools in the performance of work for STR, or who develop AI-enabled solutions on STR's behalf, must do so lawfully, responsibly, and with appropriate human oversight. Suppliers must:

- Apply human review appropriate to the task, and treat AI-generated output as preliminary, verifying it before relying on it for consequential decisions or deliverables;
- Never input STR trade secrets, classified information, Controlled Unclassified Information, export-controlled data, or personal information into an AI tool not authorized to receive it;
- Never use AI to create or spread deceptive, fabricated, or misleading information, including deepfakes that impersonate real people or organizations; and
- Support the Department of Defense's Ethical AI Principles when developing or deploying AI solutions in connection with STR's work.

29 YOUR BUSINESS PARTNERS

Where a contract permits it, suppliers who engage their own subcontractors, distributors, or other business partners in connection with STR's work must select those partners carefully, perform appropriate due diligence, and oversee their compliance with this Code. Suppliers remain responsible for ensuring their business partners meet these same expectations.

30 CODE COMPLIANCE

STR and its representatives may assess supplier compliance with this Code, including through facility visits and document review. Suppliers must cooperate fully with STR's compliance assessments and with any investigation of suspected misconduct, and must promptly correct any non-conformance identified. Suppliers are solely responsible for ensuring compliance with this Code by their own directors, officers, employees, and business partners.

Resources

STR appreciates our suppliers' commitment to the principles in this Supplier Code of Conduct. To speak up, seek guidance, or report concerns, suppliers may contact STR's Ethics organization:

Email: STR-Ethics@str.us

Hotline: (833) 222-5049

Anonymous reporting: <https://str.ethicspoint.com>

STR Chief Ethics & Compliance Office Christy Meyer, cristy.meyer@str.us

SVP Contracts & Supply Chain Amy Foy, amy.foy@str.us

STR Director of Supply Chain James Rock, james.rock@str.us

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