

# Supplier Code of Conduct



INTEGRITY OF  
BUSINESS  
PRACTICES



PROTECTION OF  
INFORMATION



QUALITY



HEALTH &  
SAFETY



INTERNATIONAL  
TRADE  
COMPLIANCE



LEGAL  
COMPLIANCE

signature  
science<sup>®</sup> LLC

# Supplier Code of Conduct

SIGNATURE SCIENCE, LLC (SIGSCI) IS COMMITTED to providing innovative solutions for homeland security and national defense applications. In service to our clients, our employees adhere to our *Code of Business Practices and Ethical Conduct*, which mandates one of the highest standards of professional integrity in the industry. We believe that ethical conduct in all our business activities is of paramount importance.

Our network of trusted vendors, subcontractors, consultants, and suppliers of goods and services (our “Suppliers”) is an important part of our business, and as we hold ourselves to our own ethical standards, so too do we expect our Suppliers to maintain processes and procedures that reflect a commitment to conduct business with absolute emphasis on ethical conduct. This *Supplier Code of Conduct* is provided to communicate our expectations to our Suppliers, and we require our Suppliers to establish the appropriate systems to comply with these expectations in concert with the size and complexity of their business operations. SigSci believes the essence of compliance with applicable laws, regulations, and rules means meeting not only the letter, but also the intent of the rule. We expect our Suppliers to foster corporate cultures that do the same.

This *Supplier Code of Conduct* expresses the minimum expectations SigSci has for Suppliers related to conduct of business activities and does not modify or otherwise alter the terms and conditions of any agreements between SigSci and its Suppliers. If a Supplier feels any guidance provided in this document conflicts with terms and conditions of an agreement, the Supplier is expected to first comply with the applicable laws, regulations, or rules, and then with the terms and conditions of the agreement.

Questions or concerns related to the *Supplier Code of Conduct*, as well as any reports of violations, may be made anonymously to SigSci’s Ethics Review Board by calling toll-free to (844) 796-1304 or online at <https://www.signaturescience.ethicspoint.com>.



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## COMPLIANCE WITH LAWS

Suppliers are expected to maintain full compliance with all laws and regulations applicable to their business. When conducting international business, or if their primary place of business is outside the United States, Suppliers must also comply with local laws and regulations.

### **Maintain Accurate Records**

Suppliers are expected to create accurate records and shall not alter any record entry to conceal or misrepresent the underlying transaction represented by it. All records, regardless of format, made or received as evidence of a business transaction must fully and accurately represent the transaction or event being documented. When a record is no longer needed to conduct current business, records should still be retained based on the applicable retention requirements. Suppliers performing work for SigSci under a contract issued by an agency of the U.S. Government must comply with the retention requirements in Subpart 4.7 of the Federal Acquisition Regulation.

For the avoidance of doubt, records related to the charging of time are expressly included in the expectation to maintain accurate records. All hours worked and billed in support of a U.S. Government contract must be accurately recorded and billed appropriately in accordance with the terms of the agreement. This requirement or similar language must be flowed down to suppliers at all lower tiers where billable labor is part of the Supplier's scope of work.



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## CONFLICTS OF INTEREST

Suppliers are expected to avoid or mitigate all conflicts of interest, or situations giving the appearance of a potential conflict of interest, when working to support SigSci. When a Supplier is working in support of SigSci for a client of SigSci, the Supplier may not simultaneously engage in any activities which would conflict with the interest of either SigSci or the client, including the ability to receive impartial advice, or conflict with the personal interests of the Supplier or the Supplier's close relatives and associates. If a Supplier identifies a conflict of interest, either actual or potential, the Supplier will notify all affected parties immediately.



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## WORKPLACE PRACTICES

### **Non-Discrimination in Employment**

Suppliers are expected to provide equal employment opportunity to all employees and applicants for employment, without regard to race, ethnicity, religion, color, sex, national origin, age, military veteran status, ancestry, sexual orientation, gender identity or expression, marital status, family structure, genetic information, or mental or physical disability. Suppliers are also expected to provide reasonable accommodations to employees when necessary to allow essential functions of a job to be performed.

### **Harassment-Free Workplace**

It is SigSci's policy to provide everyone with a workplace that is free from harassment of all forms. This includes all interactions with Suppliers. Harassment in any manner by Suppliers or their employees relating to an individual's race, ethnicity, religion, color, sex, national origin, age, military veteran status, ancestry, sexual orientation, gender identity or expression, marital status, family structure, genetic information, or mental or physical disability is expressly prohibited.

### **Drug-Free Workplace**

Suppliers shall maintain a workplace free from the illegal use, possession, sale, or distribution of controlled substances, and from the use, possession, sale, or distribution of alcohol or prescription medication without a prescription while on SigSci or client premises, as well as while performing work for SigSci.

Employees of Suppliers shall not be impaired or under the influence of any drugs or alcohol that adversely affects work performance, endangers the safety of the employee or others, or puts SigSci's reputation at risk.

Suppliers shall require participation of employees performing work on behalf of SigSci in any drug testing programs that may be mandated by the terms and conditions of agreements between SigSci and the Supplier.

### **Whistleblower Protection**

Suppliers are expected to provide their employees with avenues for raising legal or ethical issues or concerns without fear of retaliation. Suppliers shall take action to prevent, detect, and correct any retaliatory actions.

### **Ethics Policies**

Commensurate with the size and nature of their business, Suppliers are expected to have management systems in place to support compliance with laws, regulations, and the expectations related to or addressed expressly within this *Supplier Code of Conduct*.



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## INTEGRITY IN BUSINESS PRACTICES

### **Gifts, Gratuities, and Other Business Courtesies**

Suppliers must not offer gifts, gratuities, or other business courtesies to gain an unfair competitive advantage. In any business relationship, Suppliers must ensure the offering or receipt of any gift, gratuity, or business courtesy is permitted by law and regulation, the exchange does not violate the rules and standards of the recipient's organization, and is consistent with reasonable marketplace customs and practices.

Suppliers are reminded that SigSci employees are prohibited from accepting, offering, or giving any gifts (including meals or entertainment) from or to anyone whereby a reasonable person might perceive that the gift was made to influence business decisions. Gifts of nominal value are acceptable if they are infrequently accepted or given.

### **Illegal Payments**

Suppliers shall not offer any illegal payments to, or receive any illegal payments from, any client or lower-tier supplier, including their agents or representatives, or from any other persons. The receipt, payment, or promise of money or anything of value, either directly or facilitated in an indirect manner, that is intended to exert influence or gain improper advantage is expressly prohibited, even if local customs or laws do not prohibit such payments or offers.

### **Anti-Corruption**

Suppliers shall comply with all anti-corruption laws, regulations, and rules applicable to the operation of the Supplier's business. All Suppliers shall comply with the Foreign Corrupt Practices Act of 1977. Suppliers shall not offer or make improper payments of money or other items of value to officials, government employees, political organizations, candidates, or any other persons, even if local customs or laws do not prohibit such payments or offers.

Suppliers are expected to exercise appropriate due diligence in the selection of business partners and the completion of business activities to detect and prevent corruption to the maximum extent possible.

### **Anti-Competition**

Suppliers are expressly prohibited from participating in activities that are contrary to fair competition practices, including but not limited to the fixing of prices or rigging of bids in collusion with their competitors. The exchange of pricing information with competitors is also prohibited.

### **Insider Trading**

Suppliers (and their employees) must not use material or non-publicly disclosed information obtained in their operations as the basis for trading or for enabling others to trade in the securities of any company.



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## PROTECTION OF INFORMATION

### **Confidential Information**

Suppliers shall properly handle sensitive information, including confidential, proprietary, and personal information. Information shall not be used for any purpose (e.g., advertisement, publicity, and the like) other than the business purpose for which it was provided, unless there is prior authorization from the owner of the information.

Suppliers are expected to respect any restrictive markings or legends provided with information, and to comply with all requirements of the terms and conditions of any agreements governing the protection of information.

### **Intellectual Property**

Suppliers shall comply with all laws, regulations, and rules governing intellectual property, including cooperating with the owner of intellectual property to make a timely assertion of the owner's rights to the property, and shall protect against and deter the unauthorized disclosure of intellectual property, including any inventions, patents, copyrights, or trademarks provided, acquired, or developed in the performance of work for SigSci.

### **Information Security**

Suppliers must protect the confidential and proprietary information of others, including personal information, from unauthorized access, destruction, use, modification, and disclosure through appropriate physical and electronic security procedures.

Suppliers shall comply with all applicable data privacy laws, as well as any applicable regulations and terms and conditions of agreements between SigSci and the Supplier regarding the protection of information, to include the flowing down of applicable requirements to any lower-tier supplier or vendor employed in support of work performed on behalf of SigSci.



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## HEALTH AND SAFETY

Suppliers shall protect the health, safety, and welfare of all people who may be affected by the Supplier's activities.

Suppliers are expected to actively manage risks and hazards, conserve natural resources, and protect the environment, human life, and property and structures. This includes establishing systems and processes appropriate to the scale and operations of the Supplier that monitor regulatory compliance and mitigate non-compliance.

SigSci expects Suppliers to fully comply with all applicable environmental, health, and safety laws, regulations, rules, and directives, including instructions provided by SigSci or clients.



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## QUALITY

Suppliers are expected to take due care to ensure that all work product meets any quality standards stated in the terms and conditions of specific agreements. Suppliers are expected to have in place quality assurance processes to identify defects and implement corrective actions and to facilitate the delivery of a product whose quality meets or exceeds contract requirements.



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## INTERNATIONAL TRADE, SUPPLY CHAIN, AND HUMAN RIGHTS COMPLIANCE MATTERS

### Imports and Exports

SigSci expects Suppliers to ensure their business practices are in accordance with all applicable laws, directives, and regulations governing the import or export of parts, components, and technical data.

### Supply Chain Security

When applicable, Suppliers are encouraged to implement practices to ensure the security of their supply chains in accordance with the U.S. Department of Homeland Security's [Customs-Trade Partnership Against Terrorism](#) initiative.

### Supply Chain Integrity

Suppliers are expected to develop, implement, and maintain processes appropriate to their products to minimize the risk of introducing counterfeit parts and materials into deliverable products. Effective processes should be in place to detect counterfeit parts and materials, provide notification to recipients of counterfeit parts when warranted, and exclude counterfeit parts from products delivered to SigSci or SigSci's clients. When applicable, Suppliers shall comply with regulations governing detection of counterfeit parts in accordance with the terms and conditions of agreements between SigSci and the Supplier.

### Anti-Boycott

Suppliers are prohibited from participating in, cooperating with, or furthering the cause of any unsanctioned foreign economic boycott, in accordance with the Export Administration Act of 1979 and the Tax Reform Act of 1976.

### Conflict Minerals

Suppliers must adhere to all United States laws and regulations requiring reporting companies to make specialized disclosures and conduct due diligence concerning the use of conflict minerals that may have originated in the Democratic Republic of the Congo

or an adjoining country. Conflict minerals include cassiterite, columbite-tantalite, gold, and wolframite or their derivatives (tantalum, tin, and tungsten). Under the Securities Exchange Act of 1934, reporting companies that manufacture or contract to manufacture products that contain conflict minerals must conduct due diligence on the source and chain of custody of the applicable conflict minerals and file a report with the U.S. Securities and Exchange Commission.

Suppliers are expected to develop appropriate due diligence processes to meet any reporting obligations to ensure all products are responsibly manufactured in compliance with laws and regulations related to conflict minerals, and are required to promptly report to SigSci if conflict minerals will be used in performance of work for SigSci.

### **Child Labor**

The use of child labor by Suppliers or their lower-tier suppliers or vendors in the performance of work for SigSci is expressly forbidden. The term “child” refers to any person under the minimum legal age for employment where work is performed.

### **Human Trafficking**

Suppliers must adhere to regulations prohibiting human trafficking and comply with all applicable local laws in the 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 related to human trafficking, and notify SigSci (or, as appropriate, the appropriate designated individual at SigSci’s client) immediately of violations and action taken against employees found to have violated these rules. Specifically, Suppliers are prohibited from the following actions:

- 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.





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## SUPPLIER CODE OF CONDUCT COMPLIANCE

### **Consequences for Violating *Supplier Code of Conduct* Expectations**

In the event of a violation of any of the expectations stated in the *Supplier Code of Conduct*, SigSci may pursue corrective action to remedy the situation. In the case of a violation of law or regulation, SigSci may be required to report those violations to proper authorities. SigSci expressly reserves the right to terminate a relationship with any Supplier under the terms and conditions of the agreements between SigSci and the Supplier in the event of a violation of the *Supplier Code of Conduct*.

### **Reporting Concerns or Violations**

If you believe that SigSci, a Supplier of SigSci, or any of their respective employees or agents have violated the *Supplier Code of Conduct* or otherwise acted improperly or unethically, you may report your concerns to SigSci's Ethics Review Board by calling toll-free to (844) 796-1304 or online at <https://www.signaturescience.ethicspoint.com/>.