

**MISSIONESSENTIAL<sup>®</sup>**

# **Code of Business Ethics and Conduct**

## CEO Message

At Mission Essential, our standard for each mission — regardless of customer, location, or service — is excellence. And that means excellence in all areas of the business. Mission Essential is committed not only to flawless performance and customer support, but also to unassailable ethics and compliance practices. It is therefore with great pride that I present the Mission Essential Code of Business Ethics and Conduct.

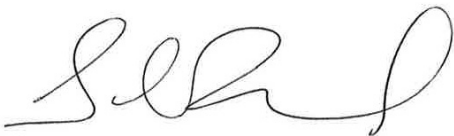
The Code is an essential document. It guides our everyday business decisions and sets the tone for our corporate culture. The Code ensures that our core values — Integrity, Accountability, Collaboration and Agility — are not lost amid the din of execution.

Mission Essential has a long, proud history of making ethical choices. Our ethics are an important part of a strong foundation of trust, one upon which we have built our stellar reputation, and one that will continue to guide us to success. Each employee — in every function, at every level — must conduct themselves at the highest level of ethical behavior and in complete compliance with all applicable laws and regulations. Our high standards are the same whether we are working in our local office or in a distant corner of the world. That consistency should be — indeed, must be — as important to us as performance or profit.

Monitoring our Ethics & Anti-corruption agenda is a top priority. I have direct involvement with establishing and ensuring compliance with this agenda, and I want to ensure we are doing everything we can to continue to earn the trust of our customers, shareholders, business partners, and colleagues.

This Code covers a wide array of topics, and I recognize that some of those topics involve complicated areas of law or compliance. Never hesitate to contact members of the Human Resources, Compliance, or Legal departments if you have questions. As a Mission Essential employee, it is your responsibility not only to abide by its provisions, but ensure that your colleagues do as well. Your understanding of, and adherence to, the standards set forth in this document are vital to Mission Essential's continued success.

Respectfully,

A handwritten signature in black ink, appearing to read 'Sunil Ramchand', written in a cursive style.

Sunil Ramchand  
Chief Executive Officer

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**Values**

## Integrity

Integrity is our foundation. We are honest and ethical in all we do.

## Collaboration

We are an inclusive team. We contribute selflessly, communicate openly, and coordinate to achieve shared goals.

## Accountability

We are responsible first for ourselves and then for our team. We hold each other to excellence, measure results, learn from mistakes, and continually improve.

## Agility

We embrace change as an opportunity. We balance speed and flexibility with discipline and precision to anticipate challenges and develop creative solutions.

# Introduction

**Mission Essential maintains a zero-tolerance stance towards corruption in all its forms. It is Mission Essential's expectation that any person representing the company in an official capacity abide by this Code of Ethics and Business Conduct, and all applicable laws and regulations related to the conduct of our business.**

### Employee Responsibilities

As a Mission Essential employee, you are expected to comply with both the letter and the spirit of our Code. This means you must understand and comply with all company policies, laws, and regulations that apply to your job, even if you feel pressured to do otherwise. Our Code also requires you to seek guidance if you have questions or concerns and to cooperate fully in any investigation of suspected violations of the Code that may arise in the course of your employment.

Periodically, you may be asked to provide a written acknowledgement that you have reviewed and understand Mission Essential's Code of Conduct, complied with its standards, and are not personally aware of any violations of the Code by others. This is your pledge to live up to our Code and its expectations and to promptly raise concerns about any questionable situation. Employees who violate our Code put themselves, their fellow employees, and their company at risk, and are subject to disciplinary action up to and including termination of employment.

### Compliance With the Law

You must conduct business in accordance with applicable laws and regulations and the Code. There are many laws and regulations that apply in each of the countries where we do business. You must comply with the requirements of all applicable laws and regulations. This is mandatory and is not subject to business priorities or individual discretion.

### Contact Us

If you would like to remain anonymous:

Mission Essential  
6525 West Campus Oval,  
Suite 101  
New Albany, Ohio 43054

### Ethics Hot Line

1 866 790 3571

### Ethics E-mail

[Ethics@missionessential.com](mailto:Ethics@missionessential.com)

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For lower-level direct problem solving, please contact your manager, supervisor, or C-level executive.

## Section 1

# INTEGRITY AND FAIRNESS WITH OUR CUSTOMERS

We develop integrated solutions to meet the challenging needs of our customers. We build enduring relationships through superior performance. We are responsive, straight-forward, and committed in all our dealings with customers.

### 1.1 Delivering Quality Services

We deliver quality services consistent with each customer's requirements. Our goal is to be the recognized leader in our marketplace for innovation, quality, responsiveness, and value. We meet both our own quality standards and our customers' requirements as set forth in contracts and agreements. To ensure we meet our quality commitments, we:

- Make achievement of high quality service and excellence a personal goal.
- Strive to do each job right the first time.
- Prepare all required reports accurately and completely.
- Comply with contract requirements.

### 1.2 Accurate Labor Charging

We are committed to honest and accurate reporting when charging costs to our customers. Accurately reporting labor charges is essential, and legally required, because it is the source for charging direct costs and distributing overhead costs to a contract. We are each responsible for understanding and complying with the labor reporting procedures at our locations.

### 1.3 Honest Communications and Marketing Activities

Lasting customer relationships are built on integrity and trust. We seek to gain advantage over our competitors through superior service, not improper or questionable business practices. Truthful and accurate communication about services is essential to meeting our responsibilities to our customers. We must be honest in marketing; in preparing bids and proposals based on current, accurate, and complete cost and pricing data; and in negotiating contracts.

### 1.4 Information Gathering

The marketplace requires gathering a wide range of information in a systematic (and legal) manner. We will not gather our competitors' or our customers' information by inappropriate means. We are committed to avoiding even the appearance of improper information gathering and therefore may not obtain, accept, or receive:

- Any information from any customer, competitor or other source to which Mission Essential is not clearly and legitimately entitled.
- Information such as proposal prices, competitor pricing, or technical data, proposal evaluations, internal government estimates, or any information marked by the U.S. Government or other governmental entity as "source-selection information."
- Confidential or proprietary information in any form possessed by new hires from their prior employers.



**I worked for a competitor a few years ago and retained some computer files from my time there. Can I use them?**

This issue should be reported to the Legal Department or the Ethics Officer. The information contained in those files may be proprietary, meaning it doesn't belong to you or Mission Essential. Proprietary information cannot be used or retained after your prior employment. The information should be returned to your previous employer unless that employer directs you to destroy the files. Legal Department or Ethics Officer oversight will assure that the information is appropriately safeguarded and verification of the return or destruction of the material is recorded.

## Section 1

# INTEGRITY AND FAIRNESS WITH OUR CUSTOMERS

- A company's proprietary or confidential information made available by consultants or others who previously had a business relationship with that company.

There are also strict rules against gaining access to information relating to U.S. Government procurements which are discussed under the section "Procurement Integrity." If you ever have reason to believe that the release or receipt of any information is unauthorized, or you are uncertain as to our legal right to use the information, do not copy, distribute, or use it until the situation has been reviewed and resolved by the Legal Department.

### 1.5 Foreign Corrupt Practices Act

Upholding the reputation of Mission Essential for the ethical conduct of business is important both within the United States and internationally. The Foreign Corrupt Practices Act (FCPA) and other U.S. laws prohibit payment of any money or anything of value to a foreign official, foreign political party (or official thereof), or any candidate for foreign political office for the purposes of obtaining, retaining, or directing of business. You are expected to be knowledgeable of, and strictly abide by, these laws. For more information, see Mission Essential's Foreign Corrupt Practices Act Compliance policy.

### 1.6 Providing Gifts and Entertainment

Our business transactions must always be free from even a perception that favorable treatment was sought, received, or offered by gifts, favors, hospitality, entertainment, or similar gratuities. We are expected to follow a course of action that complies with the following guidelines. Direct all questions concerning gifts or entertainment to your Manager, the Ethics Officer, or the Legal Department.

#### 1.6.1 Gifts and Entertainment with U.S. Government Representatives

Except as otherwise permitted by law or regulation, no one may offer or provide any business courtesy, including meals, gifts, entertainment, travel or lodging expenses to any U.S. Government employee or representative. Modest refreshments—such as soft drinks, tea, coffee, and fruit offered on an occasional basis in conjunction with business activities—are acceptable. If you deal with representatives of a particular federal agency, you are responsible for complying with that agency's standards of conduct. Where there is a question as to a particular agency's requirements under its standards of conduct, you must contact the Ethics Officer in advance for guidance.



**A vendor, for whom I am the point of contact, has offered me two tickets to a sporting event that I'd like to attend. We are in the middle of a multi-year agreement with the vendor.**

Mission Essential's gift and conflict of interest policies may permit you to accept the tickets under these circumstances. However, you are required to check with the Ethics Officer first if you are unsure. Relationship building can be a benefit to the company, so long as the business courtesy accepted is not lavish, frequent, or intended to influence a business decision.



## Section 1

# INTEGRITY AND FAIRNESS WITH OUR CUSTOMERS

### 1.6.2 Gifts and Entertainment with Non-Government Persons

Mission Essential may provide meals, refreshments, or entertainment of reasonable value to non-government persons in support of business activities, provided the business courtesy is not offered for something in return, and it does not violate any law, regulation, or the standards of conduct of the recipient's organization. It is our responsibility to inquire about prohibitions or limitations of the recipient's organization before offering any business courtesy, which must be consistent with marketplace practices, infrequent, and modest. It cannot cause embarrassment or reflect negatively on our reputation if it were to become known.

### 1.6.3 Gifts and Entertainment with Foreign Government Employees and Officials

Employees of national and local governments are subject to a wide variety of different laws and regulations. We must consult our location's policies, applicable laws, and regulations prior to offering anything to such employees. You must get approval of the Ethics Officer or the Legal Department before offering any gift to a foreign government official. In instances where customs in certain countries require the exchange of gifts, the Company will, to the extent permitted, provide the gift. Any gifts received from representatives of these countries will become Company property.

Whether you are a Mission Essential employee based in the United States or abroad, you must understand and abide by the FCPA, which prohibits giving anything of value to a foreign official for the purpose of improperly influencing an official decision. It also prohibits unlawful political contributions to obtain or retain business overseas. The FCPA prohibits the use of false records or accounts in the conduct of foreign business. Before offering anything of value to foreign public officials, including payments to facilitate routine government action, you must get advance approval from the Legal Department. You must also be careful when considering retaining agents to represent our interests outside the United States. Mission Essential has strict approval requirements for such consultants.

## Section 1

# INTEGRITY AND FAIRNESS WITH OUR CUSTOMERS

### 1.7 Avoiding Kickbacks

We believe in safeguarding the integrity of the procurement process for all of our customers. Therefore, **nothing** of value is to be given or accepted as a basis for awarding or obtaining contracts or subcontracts or for favorable treatment under contracts or subcontracts. A kickback or bribe is any:

- Money, Fee, or Commission;
- Credit;
- Gift or Gratuity;
- Thing of value;
- Or compensation of any kind;

that is provided, directly or indirectly, and that has, as one of its purposes, the improper obtaining or rewarding of favorable treatment in a business transaction.

As even the appearance of a kickback can be damaging, do not offer or accept anything of value in order to influence a business transaction. If you have reason to believe that a bribe or kickback has been given or accepted, you must immediately report this to our Legal Department or the Ethics Officer.

### 1.8 Additional Special Requirements for U.S. Government Customers

#### 1.8.1 Security and Confidential Information

Mission Essential, as a contractor with the U.S. Government, is obligated to implement and maintain a system of security controls. To ensure we meet requirements for security and protecting confidential information, we must:

- Comply with all applicable government and customer security requirements.
- Report to management and security personnel security violations or situations that could compromise or otherwise affect the security of our personnel, facilities, information and/or contracts.
- Follow established procedures for safeguarding government-classified information in our possession.
- Follow established procedures for protecting sensitive customer and business information, including, but not limited to: telephone directories, program information, personnel, and financial information, business plans, and other related information. Such information is not to be released outside of the Company (including to family and friends) without approval.
- If you have any questions about security matters, contact your supervisor, security representative, or the Ethics Officer.

## Section 1

# INTEGRITY AND FAIRNESS WITH OUR CUSTOMERS

### 1.8.2 Procurement Integrity and Post-Employment Restrictions

The U.S. Government has a number of laws designed to protect the integrity of the procurement process. “Procurement Integrity” requires the following:

- We may not solicit or obtain another contractor’s bid or proposal information, or U.S. Government source-selection information, from any source before the award of a competitive contract unless specifically authorized by law and in writing.
- U.S. Government procurement officials must report any contacts by a bidder regarding future or potential employment, and may be required to disqualify themselves from the procurement.
- U.S. Government agency officials who held certain procurement-related positions or responsibilities may not accept compensation as an employee, officer, director, or consultant within a period of one year after the former official was involved in the procurement or program.
- There are also other post-employment restrictions on various U.S. Government personnel depending upon their rank, grade, or official duties. Because of the complexities in this area, you should not engage in any employment discussions with U.S. Government personnel without prior approval from Mission Essential’s Human Resources and Legal Departments.
- Offers by anyone to provide unauthorized contractor bid and proposal information or source-selection information to Mission Essential must be refused and immediately reported to Mission Essential’s Legal Department.

Because the Procurement Integrity provisions are complex, any questions should be presented to your supervisor, manager, or the Mission Essential Legal Department to obtain appropriate advice and guidance. Mission Essential also has an established policy regarding the hiring of any former Government employees that must be reviewed by any employee who anticipates contact with the Government that could result in discussions about employment with the Company.

### 1.8.3 Truth In Negotiations Act (TINA)

All cost and pricing data in our proposals must be accurate, complete, and current as of the date of final agreement on price. Whether you are the contract negotiator, the cost estimator, or the person responsible for furnishing data to the cost estimator, you must ensure that the data meet Federal Acquisition Regulation (FAR) requirements. For any questions as to whether information is cost or pricing data that must be disclosed to the U.S. Government, seek advice from the Procurement, Compliance, or Legal Departments. Any doubts must be resolved in favor of disclosure.

## Section 1

# INTEGRITY AND FAIRNESS WITH OUR CUSTOMERS

### 1.8.4 False Statements

We must not knowingly and willfully falsify or conceal any fact, make any false, fictitious or fraudulent statements or representations, or use any false writings in connection with any matter within the jurisdiction of the Executive, Legislative, or Judicial branches of the U.S. Government. This necessarily includes the requirement to accurately report labor time worked to the correct charge code.

### 1.8.5 False Claims

The False Claims Act prohibits any individual or company from knowingly submitting or causing the submission of false claims to the U.S. Government. A “claim” is broadly defined by this law and includes, but is not limited to, any request, demand, or submission whether under contract or otherwise, for money or property, which is made to a contractor, grantee, or other recipients if the U.S. Government provides any portion of the money or property requested, or if the U.S. Government will reimburse such recipients for any portion of the money or property requested.

A “claim” also includes any request, demand, or submission that has the effect of decreasing an obligation of the Company to the U.S. Government. “Knowingly” is broadly defined in this Act, and it includes when a person acts in deliberate ignorance or in reckless disregard of the truth or falsity of the information. False claims submitted to the U.S. Government, regardless of the dollar value involved, raise serious legal issues and threaten the Company’s livelihood. Any questions about what constitutes a false claim, as well as any information regarding potential violations of the law, must be immediately reported to the Legal Department.

### 1.8.6 Mandatory Obligation to Disclose Certain Misconduct

The FAR requires Mission Essential to disclose credible evidence of a violation of federal criminal law involving fraud, conflict of interest, bribery, or gratuity violations, as well as claims under the civil False Claims Act, and significant overpayments. This mandatory disclosure obligation continues up through three (3) years after contract close-out. To comply with these obligations, all Mission Essential employees must immediately report any issues that could potentially constitute a violation of criminal or civil law, or significant overpayment on a Government contract, to the Ethics Officer or Legal Department. If you wish to remain anonymous, you may also report these matters through the Ethics Hotline 1 866 790 3571 or to [Ethics@missionessential.com](mailto:Ethics@missionessential.com).

## Section 1

# INTEGRITY AND FAIRNESS WITH OUR CUSTOMERS

### 1.8.7 Use of Suspended /Debarred Contractors

We must ensure that individuals and/or companies listed on the General Services Administration's List of Parties Excluded from Federal Procurement and Non-procurement Programs are not hired as employees or consultants or used as subcontractors on U.S. Government contracts, unless appropriate approval has been obtained. Direct any questions to the Legal Department.

### 1.8.8 Byrd Amendment

This law prohibits the use of appropriated funds to pay any person for influencing or attempting to influence officials of the Executive or Legislative branches (including members of Congress and their staffs) of the U.S. Government in connection with the award or modification of U.S. Government contracts. Direct any questions to the Legal Department.

### 1.8.9 Whistleblower Protection

Mission Essential will not tolerate retaliation against an employee for making a good faith complaint or for participating in an investigation, proceeding, or hearing conducted by Mission Essential or any government agency tribunal or commission. The law prohibits contractors and subcontractors from discharging, demoting, or otherwise discriminating against an employee as a reprisal for disclosing, to any of the authorized entities, information that the employee reasonably believes is evidence of gross mismanagement of a DoD contract, a gross waste of DoD funds, an abuse of authority relating to a DoD contract, a violation of law, rule, or regulation related to a DoD contract (including the competition for or negotiation of a contract), or a substantial and specific danger to public health or safety. Such reprisal is prohibited even if it is undertaken at the request of an executive branch official, unless the request takes the form of a non-discretionary directive and is within the authority of the executive branch official making the request. Mission Essential acknowledges and understands that nothing under the law provides any rights to disclose classified information not otherwise provided by law.

## Section 2

# INCLUSIVE, FAIR, AND HEALTHY WORK ENVIRONMENT

We treat people with dignity, fairness, and respect. We create an inclusive environment focused on a common purpose where diversity in people and perspective is valued. We cooperate across organizational boundaries, adding value and earning the trust of our teammates.

### 2.1 Diversity and Equal Opportunity Commitment

Mission Essential is an equal opportunity/affirmative action employer. We consider all applicants— whether outside or internal candidates—without regard to race, color, religion, sex, national origin, disability, or veteran status. We are committed to attracting, developing, and retaining a highly-qualified, diverse, and dedicated work force, and we do not tolerate discrimination based upon race, color, religion, sex, national origin, disability, or veteran status.

It is the Company policy to comply fully with all laws regarding equal opportunity. Employees are expected to abide by anti-discrimination laws, and failure to so abide will result in disciplinary action, including termination of employment.

### 2.2 No Violence in the Workplace

Mission Essential will not tolerate threatening or abusive behavior by employees in the workplace, while operating company vehicles, on company business, or by any persons on company property. We will take immediate and appropriate action against offenders, up to and including termination and referral for criminal prosecution.

Employees shall not possess, demonstrate, or use a weapon while on Mission Essential owned, leased, or controlled property, or on company business, unless specifically authorized by the applicable contract for the performance of duties. You must report any instance of violence or possession of weapons on company property to Security and a supervisor immediately. In cases of imminent danger, contact 911 or local law enforcement first, and then contact Security.

Domestic violence can adversely affect workplace safety. If you are, or know of, a person subjected to domestic violence, notify the police and Security of any person who may affect your or others' safety. For further assistance, contact the Human Resources Department or the Employee Assistance program through Cigna 1-877-622-4327 or UNUM 1-800-854-1446.

### 2.3 Anti-Harassment

Mission Essential does not tolerate discrimination or harassment based on age, race, color, national origin, religion, gender, disability, or any other legally protected category under federal, state, or local law. Harassment includes, but is not limited to, offensive or unwelcomed comments, jokes, gestures, or any other action that creates an intimidating, hostile, or offensive work environment. Harassment also includes any conduct that inappropriately or unreasonably interferes with work performance. Employees should refer to Mission Essential's anti-harassment policy for reporting procedures.



#### **I overheard a manager using disparaging language towards a fellow co-worker. What should I do?**

Mission Essential maintains a zero tolerance policy towards discriminatory harassment, bullying, or intimidation, of or by employees. Employees are responsible for respecting the rights of their co-workers, and for creating a professional work environment in which all individuals are treated with respect and dignity. It is your responsibility to report the incident to your supervisor, the Human Resources department, the Ethics Officer, or the Ethics Hotline.

## Section 2

# INCLUSIVE, FAIR, AND HEALTHY WORK ENVIRONMENT

### 2.4 Safeguarding Health and Safety

Mission Essential is committed to employee health and safety at all of our locations. Each of us must follow the rules and procedures established at our locations to ensure a healthy and safe working environment, and must immediately report any work-related accident or injury.

Federal or other agencies may conduct health and safety inspections. You must comply with these inspections and report any contact from a governmental agency or official immediately to your manager and/or the Legal Department so that appropriate personnel may assist in any inspection.

### 2.5 Drug and Alcohol Abuse

Mission Essential is committed to maintaining a safe and drug-free workplace. Each employee is required to pass a drug screen prior to commencing work and may be subjected to additional drug or alcohol testing. We will not tolerate the use, sale, or purchase of illegal drugs or the abuse of prescription or over-the-counter medications, alcohol, or other substances. All employees are held accountable for ensuring that their performance and judgment are unimpaired by alcohol or other substances while on duty.

### 2.6 Protecting Privacy

We are committed to protecting the privacy of all of our employees. Only employees who are authorized and who have a work-related reason may access company personnel and medical records. Employees who have access to private data must protect the security of this information.

### 2.7 Human Trafficking

Mission Essential and the U.S. Government have a zero tolerance policy with respect to human trafficking. Trafficking includes the recruitment, harboring, transportation, or provision of a person for labor or services, through force, fraud, or coercion. Employees and subcontractors shall not: (1) engage in severe forms of trafficking in persons during the period of performance of the contract; (2) procure commercial sex acts during the period of performance of the contract; or (3) use forced labor in the performance of the contract. Each employee is required to complete human trafficking training in order to raise awareness and help identify the signs of trafficking both within the United States and abroad. It is the duty of every Mission Essential employee to be alert to signs of trafficking, whether by other Mission Essential employees, Mission Essential subcontractors or vendors, or other third parties, and report such behavior to proper authorities. Actions taken for violations of this policy may include, but are not limited to, removal from the Government contract or subcontract, reduction in benefits, and termination of employment.

## Section 3

# INTEGRITY AND FAIRNESS IN THE WORKPLACE

We have a responsibility to protect our company, our reputation, and ourselves by acting in the best interests of Mission Essential.

### 3.1 Avoiding Conflicts of Interest

Each of us is required to disclose any actual or potential conflict of interest that may arise. Conflicts of interest fall into two main categories:

#### 1. Organizational conflicts of interest

- Gaining a competitive advantage through access to information
- Unfair competitive advantage through helping to set the rules or scope of a future contract
- Impaired objectivity in performing or evaluating work

#### 2. Personal conflicts of interest

While we cannot list every possible scenario for a personal conflict of interest, the following are common examples:

- **Financial Interests in Other Businesses.**

Each employee must immediately disclose any direct financial interest in any current or potential supplier, customer, or competitor.

- **Certain Relationships.**

If family members or others with whom you have a close relationship work for a supplier, customer, or competitor, you must immediately disclose that situation.

- **Corporate Opportunities.**

No employee may take personal advantage of business opportunities that are discovered through company property, information, or position.

- **Outside Employment with a Supplier or Customer.**

No employee may be employed by or serve as a director of a supplier or customer.

- **Outside Employment with a Competitor.**

No employee may compete with Mission Essential or consult with or be employed in any capacity by a competitor.

Any perceived conflict of interest must be acknowledged by an employee or candidate for employment so that it may be submitted to the Legal Department for review and analysis. The Legal Department will determine what steps should be taken to mitigate any risk the perceived conflict could involve for the Company, or whether the perceived conflict presents a risk to the Company that cannot be mitigated.



#### I have a relative who works for a subcontractor to Mission Essential. Is this an issue?

It might not be. However, you are required to disclose this relationship to the Legal Department, so that Mission Essential can ensure that continuing to do business with, or awarding new business to, the subcontractor is not influenced in any way by your family relationship or your position within the company.



### Section 3

## INTEGRITY AND FAIRNESS IN THE WORKPLACE

### 3.2 Protecting Company Assets and Property

The Company's resources, assets, and property are necessary to our success and we must be responsible with their care. Generally, we must refrain from personal use of company assets and resources.

We recognize that occasional and insignificant personal use of assets may be acceptable if there is no undue cost to the Company and no interference with productivity. It is never acceptable to use company resources:

- To support a personal business or the business of any other firm;
- For an illegal act;
- For a purpose which would cause embarrassment to the Company.

Managers are responsible for the assets assigned to their departments and they are authorized to impose more restrictive personal-use conditions. Managers are expected to exercise good judgment when imposing such conditions so as to avoid problems in the workplace.

### 3.3 Use of Information System Assets

Information systems are critical to our business success. Everyone who uses our information systems assets must use these systems responsibly and primarily for legitimate business purposes. Our policy prohibits the use of our information systems for the purpose of:

- Engaging in communications that are illegal, offensive, defamatory, harassing, obscene, vulgar, or otherwise disruptive to normal business activity.
- Visiting inappropriate Internet sites.
- Improperly disseminating copyrighted or licensed materials or confidential and proprietary information.
- Sending confidential or proprietary information outside of the Mission Essential network unless specifically authorized to do so.
- Installing hardware or software without advance authorization from IT personnel
- Conducting non-Mission Essential business.

Communications that you have at work (including e-mail, voicemail network, Internet, etc.) are not necessarily private, and confidentiality should not be assumed. Mission Essential reserves the right to monitor or make records of all such communications to verify that company policies are being followed or for other legitimate business reasons.

### Section 3

## INTEGRITY AND FAIRNESS IN THE WORKPLACE

### 3.4 Safeguarding Confidential Information

In carrying out Mission Essential business, employees, officers and directors often learn confidential or proprietary information about the Company, its customers, prospective customers, or other third parties. Employees, officers, and directors must maintain the confidentiality of all information so entrusted to them, except when disclosure is authorized or legally mandated. Confidential or proprietary information includes, among other things, any non-public information concerning Mission Essential, including its businesses, financial performance, results or prospects, and any non-public information provided by a third party with the expectation that the information will be kept confidential and used solely for the business purpose for which it was conveyed.

### 3.5 Maintaining Accurate Books and Records

We make decisions based on information recorded at every level of the company. It is critical that the financial and nonfinancial data that we report be accurate, complete, and valid in all material respects. Company business documents, including internal or external correspondence, memoranda, or communication of any type, must be prepared completely, honestly, and accurately. Transactions between the company and outside individuals or organizations must be promptly and accurately entered in our books and records. No undisclosed fund may be established for any purpose.

If you have reason to believe that a crime has been committed or that an investigation or legal proceeding may commence, you must retain any records (including computer records) that are or could be relevant to an investigation of the matter. We take integrity in financial reporting very seriously. Concerns about financial reporting must be raised with managers, the Finance Department, the Legal Department, the Ethics Officer, or the Ethics Hotline. You may submit those concerns anonymously or confidentially. Particular care must be taken to ensure that statements and claims made in relation to a U.S. Government contract or subcontract are accurate and conform to contractual and legal requirements.



**Do I really need to keep all of these old records? Some of them are over five years old.**

Yes. These records are valuable evidence of our past performance and transactions. There are frequently minimum time periods for records retention mandated by government regulations, including some records that must be kept permanently. Do not destroy any records before an evaluation has been made by your department head along with the compliance and legal departments. Refer to the Records Retention and Destruction Policy for further detail.



**I think a co-worker lists expenses on his expense report that he didn't incur. Should I say something to someone?**

Yes. Fabricating or inflating expenses on an expense report is not only a violation of our Code of Ethics and Business Conduct, but is plainly wrong. Report your concern to the Ethics Officer or the Ethics hotline.

### Section 3

## INTEGRITY AND FAIRNESS IN THE WORKPLACE

Employees must be aware of the following:

- All time worked directly or indirectly in support of any contract or subcontract must be charged accurately and to the correct charge number.
- Expense accounts and other forms requesting reimbursement must follow company procedures.
- Expense reports must only contain charges that were actually incurred in the conduct of Mission Essential's business.
- Expenses must be accurately described so that unallowable expenses may be excluded from billings to the U.S. Government.

## Section 4

# INTEGRITY AND FAIRNESS WITH SUPPLIERS

We achieve success through collaborative efforts with our business partners. We honor all of our contractual obligations. We share our standards of business conduct with our suppliers and expect that they will reflect those standards when conducting business.

### 4.1 Treating Suppliers Fairly

We treat our suppliers and business partners with fairness, courtesy, and respect. We comply with the terms and conditions of our agreements with suppliers, and we honor our commitments. We are careful to protect the confidential and proprietary information entrusted to us by our suppliers and partners. We do not and must not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair practice.

### 4.2 Selecting Suppliers

We promote competitive procurement to the maximum practical extent. Whenever procuring supplies, equipment, consulting, and other services, it is our policy to solicit a sufficient number of responsible and qualified subcontractors to obtain competitive prices and the necessary levels of quality and support. Our selection of subcontractors, suppliers, and vendors will be made on the basis of objective criteria such as, but not limited to, quality, technical excellence, price, delivery, adherence to schedules, service, and maintenance of adequate sources of supply.

## Section 5

# RESPECT FOR OUR WORKING COMMUNITIES

We are committed to being good corporate citizens and we obey the laws in the countries and communities where we operate. We practice environmental responsibility and promote positive and constructive involvement in the local community complying with laws and regulations.

### 5.1 Regulations

Our business is highly regulated, and it is the responsibility of each of us to ensure that we know and comply with the laws and regulations that apply to our job responsibilities. If you need more information about legal requirements for your position, please contact your manager or the Legal Department. Our international business activities are subject to U.S. Government laws and regulations as well as the laws and regulations of the countries in which we seek to do business. It is our policy to comply fully with these laws. In situations where there may be a conflict between local laws and our standards of conduct, consult with your manager and the Legal Department.

### 5.2 Respecting the Environment

We are committed to conducting operations and activities in a manner that protects the environment and conserves natural resources. Mission Essential employees will comply with laws and regulations relating to protection of the environment. All locations must implement and follow processes designed to comply with all applicable environmental laws.

### 5.3 Fair Competition

We believe our customers and society at large benefit from fair, free, and open markets. Therefore, we do not engage in any practices that could be viewed as price-fixing, unfairly restraining trade, or keeping competitors out of the marketplace. Mission Essential and its employees will not:

- Communicate with competitors to discuss prices, allocate markets, boycott customers or suppliers, or limit production of services for anticompetitive purposes.
- Make false statements about our competitors.
- Receive or use our competitor's proprietary information, including pricing information, improperly.

Fair competition is not just an internal requirement. Most of the countries in which Mission Essential conducts business have laws designed to promote free and open competition and to prohibit activities designed to restrain trade. For more information, contact the Legal Department.

## Section 5

# RESPECT FOR OUR WORKING COMMUNITIES

### 5.4 International Trade Regulations

We must abide by the laws, rules, and regulations of countries where we do business. We must follow both U.S. laws pertaining foreign business transactions (such as the Foreign Corrupt Practices Act and the International Traffic in Arms Regulations (ITAR)), and also the laws of host countries where we operate.

Because cultural differences and local customs or laws may raise issues, discuss these issues with your supervisor and the Legal Department prior to engaging in any international business.

#### 5.4.1 Import / Export Compliance

Mission Essential complies with all domestic and foreign import and export laws and regulations (notably ITAR). Because specific authorizations or licensing may be required, contact the Legal Department before:

- Exporting any product, service, or technical information from the U.S. or moving it between or among countries. Technical information can consist of manufacturing processes, product use, commercial and technical expertise, data, or software.
- Providing service or technical information to parties that previously have been denied an export license.
- Discussing with or displaying to foreign nationals (including Mission Essential employees or contractors) any Mission Essential technical data, equipment or non-public information.

Mission Essential's policies require you to comply with U.S. Government export control requirements. Failure to comply may result in the loss of export privileges, civil penalties, and/or criminal charges against Mission Essential and/or you.

If you have any questions about import/export compliance, contact Mission Essential's Legal Department.

## Section 5

# RESPECT FOR OUR WORKING COMMUNITIES

### 5.4.2 Payments in Foreign Countries or to Foreign Officials

Payments we make in the course of doing business internationally must reflect the value of the services actually provided, be directed to proper business purposes, made to legitimate business-service providers, and meet the requirements of the laws of the U.S. and of other countries where we do business.

It is a violation of the FCPA to make payments or related offers, or to provide any other benefit, to or for the benefit of a foreign official. Regardless of the particular customs of a foreign country, you must follow company standards, local laws, and U.S. laws regarding business with non-U.S. officials or their family members.

You must never make payments to a third party that you suspect may be passed to officials outside the U.S. or others to improperly secure, retain, or direct business for Mission Essential. You must not use an agent to make any payment that Mission Essential itself cannot make. Whenever you retain any agent in connection with foreign business, you must make sure that you can properly trace any funds provided to the agent to ensure that they are not used to make improper payments to government officials or their representatives.

### 5.4.3 Facilitating Payments

In business transactions and operations in foreign countries, companies are sometimes called upon to make payments to expedite or “facilitate” routine government actions (for example, obtaining utility services or visas, clearing customs). In some cases, these payments may be appropriate; in others, they may violate local law or the FCPA. **Do not make any new or unusual payment without specific approval from the Legal Department.**

### 5.4.4 Anti-Boycott

We must comply with U.S. laws pertaining to foreign boycotts. As part of the Anti-Boycott Act, we may not:

- Furnish information about our or any person’s past, present, or prospective relationship with boycotted countries or blacklisted companies; and/or
- Pay, honor, or confirm letters of credit containing boycott provisions.

Any requests for boycott information must be reported to the U.S. Government and the Legal Department immediately.



**I need to get some newly hired linguists into the country where they will be working. Is it OK for me to engage a facilitating agent to quickly obtain visas for these linguists?**

Facilitating payments may potentially raise issues under the FCPA. In every case, you must first bring the request to the Legal department for review and approval before making any payment to an agent, consultant, or foreign government official to facilitate any transaction.

## Section 5

# RESPECT FOR OUR WORKING COMMUNITIES

### 5.5 Avoiding Bribery and Improper Payments

To promote good government and the fair and impartial administration of laws, we must not give or receive, or promise to give or receive, anything of value to or from a government official or political party with the intent to obtain or maintain business, or to improperly affect government decisions. This prohibition also applies to third parties, agents, or any other entity acting on behalf of Mission Essential.

### 5.6 Communications with the Media

To maintain the consistency and accuracy of information, corporate spokespersons are designated to respond to all inquiries. Only these spokespersons are authorized to release information to the public at the appropriate time. Unless you have been designated as a spokesperson, you must politely decline any inquiries from the press and refer them immediately to the Chief Administrative Officer at [media@missionessential.com](mailto:media@missionessential.com).

### 5.7 Political Contributions and Activities

We believe in the importance of personal participation in the political process and encourage all of our employees to support the political parties, causes, and candidates of their choice. Our involvement and participation in the political process must be on an individual basis, on our own time, and at our own expense. Many countries prohibit corporations from donating corporate funds, goods, or services (including employees' work time), directly or indirectly, to political candidates. Any questions should be directed to the Legal Department.

### 5.8 Charitable Contributions

Mission Essential supports giving back to the communities where we operate and serve, both at home and abroad. Due care must be taken when making a contribution on behalf of the company to ensure that there is no corrupt activity, either real or perceived. Before a contribution is made in Mission Essential's name, the approval of the Ethics Officer and/or the Legal Department must be obtained.

### 5.9 Offset Contracting

Mission Essential recognizes the inherent risk of corruption involved with offset contracting. This type of contracting is not applicable to Mission Essential's business and neither Mission Essential nor any of its representatives participates in this type of contract.



## Section 6

# RAISING CONCERNS

We seek to foster a collaborative working environment that encourages all of us to raise concerns about possible violations of our standards of business conduct.

### 6.1 How to Raise a Business Conduct Concern

We offer a number of resources you can consult when you need to raise a question or concern. Depending on the nature of the concern, it may be appropriate to approach the individual responsible directly with your concerns, providing them an opportunity to clarify (or stop) his or her conduct. In the event that you are not comfortable handling the situation, or if you believe the misconduct involves a legal or a contracts issue, you should promptly consult one of the following resources:

- **Your Manager:** Your manager understands your areas of responsibility and is often in the best position to assist you if you have questions or concerns.
- **Ethics Officer:** The Ethics Officer can answer questions or address concerns on issues involving our standards of conduct. You may raise your issue in confidence and the Ethics Officer will make every effort to keep your identity confidential while conducting a thorough and fair investigation. Confidentiality will be maintained to the fullest extent legally possible.
- **Ethics Hotline:** Mission Essential maintains an Ethics Hotline that is monitored by the Ethics Officer allowing employees to raise their concerns on a confidential basis. The CONUS hotline is 1 866 790 3571. OCONUS is 011 01 866 790 3571.
- **E-mail Contacts:** The following departments can assist you with questions or concerns in their areas of expertise:

**Ethics** [Ethics@missionessential.com](mailto:Ethics@missionessential.com)

**HR** [ESC@missionessential.com](mailto:ESC@missionessential.com)

**Legal** [MEP-Legal@missionessential.com](mailto:MEP-Legal@missionessential.com)

### 6.2 What Happens After a Concern Is Raised

Mission Essential takes all reported concerns seriously and will investigate all potential misconduct to determine if any law, regulation, policy, or procedure has been violated. Mission Essential will make every effort to keep your identity confidential to the fullest extent legally possible while conducting a thorough and fair investigation.

It is important that you refrain from discussing any investigation other than with those with a legitimate need to know. If you have raised a concern with your manager or another resource, you can expect that they will follow up with you within a reasonable timeframe to provide an update on the issue. If your manager does not do so, call the Ethics Officer.

## Section 6

# RAISING CONCERNS

### 6.3 Anti-Retaliation

Anyone at Mission Essential who comes forward with concerns plays an important role in maintaining a healthy, respectful, and productive workplace, as well as in protecting our stakeholders. These colleagues help the Company to address problems early—before more serious consequences develop. It is important for each of us to create a working environment where anyone may raise business-conduct concerns without fear of retaliation.

Retaliation against employees who raise concerns or questions about misconduct will not be tolerated. We reserve the right to discipline anyone who knowingly makes a false accusation or has acted improperly.

### 6.4 Self-Reporting

Self-reporting on the hotline is encouraged. Like all allegations of wrongdoing, Mission Essential will evaluate each self-reported incident of substantiated misconduct on its own merit in deciding what consequential action, if any, to take. The act of self-reporting, while potentially weighing in the employee's favor, will not, of itself, preclude Mission Essential from using any of the full range of disciplinary measures available to it. A self-reported event does not remove an obligation that Mission Essential may have, depending on the nature of the misconduct, to report the incident to governmental authorities.



**Several months ago I used the Ethics Hotline to report what I believed to be a violation of our Code of Ethics and Conduct by my supervisor. Since then I have been receiving negative performance reviews from my supervisor. I think I am being retaliated against. What can I do about it?**

Mission Essential has a zero-tolerance stance on retaliation against employees who have raised concerns. It is important to bring your suspicions to the attention of the Ethics Officer so that an investigation can take place and appropriate corrective or disciplinary action be taken if warranted.

Section 7

## CODE OF ETHICS AND CONDUCT—ACKNOWLEDGEMENT

**7.1**

I hereby certify that I have read Mission Essential's Code of Business Ethics and Conduct. I understand and agree to abide by the Code. I also understand that my supervisor, the Legal Department, and the Ethics Hotline are available to me should situations arise that cause me to be uncertain about company policy. I realize that any violations of the Code of Business Ethics and Conduct may lead to disciplinary action.

Name (please print)	
Location	Employee Number
Signature	Date

Section 8

# CONFLICT OF INTEREST DISCLOSURE

## 8.1

Personal or financial relationships with customers, suppliers or competitors are very common in business today. When you disclose these relationships, your supervisor is given the chance to eliminate or minimize the effects these might have in your conducting business for Mission Essential Personnel, LLC. Please list (to the right or on reverse side of this paper), any of these relationships that may reasonably create an appearance of a conflict of interest.

If none, please initial here:

Name (please print)

Social Security Number

Location

Signature

Date