



# SUPPLIER CODE OF CONDUCT

SAIC® is a premier Fortune 500® technology integrator driving our nation's technology transformation. Using our expertise and understanding of existing and emerging technologies, we integrate the best components from our portfolio and our partner ecosystem to deliver innovative, effective and efficient solutions that are critical to achieving our customers' missions.

Our mission begins with strong governance that ensures ethical behavior and a commitment to acting with integrity and accountability. Corporate responsibility is an integral part of that commitment. We embrace a broad scope of environmental, social and governance imperatives in our daily operations and our supply chain because it makes our business, our employees, third-party providers and our communities better.

How we act is as important as the results we achieve. Ethical behavior and acting with integrity are non-negotiables in our company. SAIC and its employees are dedicated to upholding the highest ethical standards in all of our business activities. These commitments enable growth in all other areas. We have the same expectations for our suppliers. We trust that they will have goals, management and business systems in place to support compliance with the letter, spirit and intent of applicable laws, regulations and expectations related to or addressed expressly within this Supplier Code of Conduct. For the purposes of this code, “supplier” is defined as any party that directly or indirectly sells, or seeks to sell, any goods or services to our company or on our company’s behalf, including suppliers, contractors, subcontractors, distributors, dealers, sales or marketing representatives, intermediaries, agents, partners, consultants, resellers, systems integrators or similar entities.

As a member of the Defense Industry Initiative (DII) on Business Ethics and Conduct, we are committed to complying with all laws and regulations, ensuring fair competition and upholding the highest standards in all our business dealings with the U.S. Government, protecting taxpayer resources and providing high-quality products and services for the U.S. Intelligence Community, the U.S. Armed Forces and their allies. We require our suppliers to share this commitment.

Our Supplier Code of Conduct aligns with the recommendations of the DII and establishes expectations for all SAIC and SAIC subsidiary suppliers, subcontractors, consultants and other third-party providers. SAIC takes our partnerships seriously and strives to work with suppliers to meet the principles of this code of conduct. We encourage our suppliers to train their employees on our code of conduct, to implement their own codes of conduct, and to flow down the principles of their codes of conduct to the entities that support them. We also encourage our suppliers to proactively manage and mitigate risks in their supply chain and, where appropriate, report risks to us so we can ensure that they are mitigated.

At SAIC, making a difference for our stakeholders, the environment and our communities is at the core of who we are. We are committed to ethics, integrity and accountability and are proud of our work to make the world a better place—and we strive to do more.

## GENERAL DISCLAIMER

This document 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 Code.

## I. GOVERNANCE

### Contracting with the U.S. Government

We expect suppliers who work with us in support of a U.S. Government contract to follow the U.S. Government’s rules for competing fairly, including honoring restrictions applying to U.S. Government employees, gifts, hospitality and offers of employment. Suppliers must also:

- Adhere to government accounting and pricing requirements
- Comply with all other applicable U.S. Government requirements
- Promptly report any suspected violations of the Supplier Code of Conduct, laws or regulations
- Provide necessary supporting documentation and perform supply chain due diligence

### Compliance with Laws

We expect our suppliers to maintain full compliance with this Supplier Code of Conduct and all laws and regulations applicable to their businesses 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 U.S., suppliers must comply with local laws and regulations as well as U.S. laws applicable to operating in a foreign country.

#### A. MAINTAIN ACCURATE RECORDS

We expect suppliers to create accurate records and not alter the information contained in any record to conceal or misrepresent the underlying transaction it represents. All records, regardless of format, made or received as evidence of a business transaction or event must fully and accurately represent the transaction or event being documented. When a record is no longer needed to conduct current business, it must be retained in accordance with applicable retention requirements. Suppliers performing directly or indirectly as U.S. Government contractors must comply with the requirements in Part 4.703 of the Federal Acquisition Regulation. Suppliers performing as or fulfilling a U.S. Government role in their prescribed work must comply with the records requirements of the affected agency and any relevant and applicable requirements of the National Archives and Records Administration, including those for supplier time-charging and invoicing. All hours worked and billed in support of a government contract must be accurately recorded and appropriately billed in accordance with the terms of the agreement.

#### B. PROCUREMENT INTEGRITY

Our suppliers are expected to maintain the integrity of our procurement and acquisition processes. Suppliers must not



improperly use competitors' confidential or proprietary information for their own benefit. If a supplier becomes aware of any such confidential or proprietary information, it should promptly take steps to avoid its improper use and inform SAIC as appropriate.

## Global Trade Compliance

### A. IMPORT AND EXPORT

We expect our suppliers to ensure that their business practices are in accordance with all applicable laws, directives and regulations governing the import and export of parts, components and technical data, such as the International Traffic in Arms Regulation and the Export Administration Regulations. Suppliers shall provide truthful and accurate information and obtain export licenses and consents where necessary.

### B. ANTI-BOYCOTT

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

### C. ANTI-MONEY LAUNDERING

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

### D. SECURITY

Suppliers should implement applicable practices and procedures to ensure the security of their supply chains, in accordance with the Customs Trade Partnership Against Terrorism Initiative of the U.S. Customs and Border Protection.

### E. SOURCE RESPONSIBILITY AND CONFLICT MINERALS

Suppliers must adhere to federal laws and regulations requiring companies to make specialized disclosure and conduct due diligence concerning their use of conflict minerals that may have originated in the Democratic Republic of the Congo 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, 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 minerals and report their findings to the U.S. Securities and Exchange Commission. We expect our suppliers to develop due diligence processes to meet our obligations to ensure that all products are responsibly sourced and manufactured.

## Anti-Corruption

### A. ANTI-CORRUPTION LAWS

Our suppliers must comply with the anti-corruption laws, directives and regulations that govern operations in the countries in which they operate, including the U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act, regardless of local customs.

We require our suppliers to refrain from offering or making any improper payments of money or anything of value to customers, government officials, political parties, candidates for public office or other persons. This includes a prohibition on facilitating payments intended to expedite or secure performance of a routine governmental action like obtaining a visa or customs clearance, even in locations where such activity does not violate local law. Personal safety payments are permitted where there is an imminent threat to health or safety and for adherence with record-keeping requirements.

### B. ILLEGAL PAYMENTS

Our suppliers must not offer any illegal payments to, or receive any illegal payments from, any customer, supplier, their agents, representatives or others. The receipt, payment or promise of money or anything of value, directly or indirectly, intended to exert undue influence or improper advantage is prohibited. This prohibition applies even in locations where such activity does not violate local law.

### C. FAIR COMPETITION AND ANTITRUST

Our suppliers must not fix prices, rig bids or allocate customers or markets with their competitors. They must not exchange current, recent or future pricing information with competitors. Our suppliers must refrain from participating in a cartel and must comply with antitrust laws.

### D. CONDUCT PROPER DUE DILIGENCE

Our suppliers must conduct appropriate due diligence and monitoring activities to detect and prevent corruption in all business arrangements, including partnerships, joint ventures, offset agreements and the engagement of consultants and other third parties.

### E. GIFTS AND BUSINESS COURTESIES

We expect our suppliers to compete on the merits of their products and services. The exchange of business courtesies may not be used to gain an unfair competitive advantage. In any business relationship, our suppliers must ensure that offering or accepting any gift or business courtesy is permitted by law



and regulation, that these exchanges do not violate the rules and standards of the recipient's organization and that they are consistent with reasonable marketplace customs and practices.

## F. INSIDER TRADING

Our suppliers and their personnel must not use material or non-publicly disclosed information obtained in the course of their business relationship with SAIC as the basis for trading or for enabling others to trade in the securities of our company or any other company.

## Conflict of Interest

We expect our suppliers to be honest, direct and truthful when answering questions from SAIC about relationships with SAIC employees and to avoid all conflicts of interest or situations giving the appearance of a potential conflict of interest in their dealings with SAIC. We expect our suppliers to provide notification to all affected parties when an actual or potential conflict of interest arises, specifically if the supplier is engaging in work for a potential customer, supplier or competitor or has a business that may conflict with SAIC. This includes a conflict between the interests of our company and a supplier's personal interests or those of close relatives, friends or associates. Any potential conflict must be disclosed to the supplier's contractual representative and vetted in advance of performing any contracted work.

## Information Protection

We expect our suppliers to develop and maintain a measurable and documented emergency response and disaster recovery plan to protect data and intellectual property and ensure the continuity of the services or goods provided to SAIC.

## A. CONFIDENTIAL AND PROPRIETARY INFORMATION

We expect our suppliers to properly handle sensitive information, including confidential, proprietary and personal information. Information should not be used for any purpose (e.g., advertisement or promotion) other than the business purpose for which it was provided, unless that use is authorized by the owner of the information.

## B. INTELLECTUAL PROPERTY

We expect our suppliers to respect and comply with all laws governing intellectual property rights assertions, including patents, copyrights, trademarks and protection against intellectual property disclosure. Suppliers must respect and protect the intellectual property rights of all parties by only using information technology and software that has been legitimately acquired and

licensed and must use that software, hardware and content only in accordance with their associated licenses or terms of use.

## C. 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 must comply with all applicable data privacy laws and promptly inform SAIC of any unauthorized use of these assets or potential unauthorized access or compromise of its systems or data. Suppliers shall not provide access to SAIC information or customer information without a legitimate business need and permission from the responsible owner. Suppliers shall ensure the extension of this requirement to all sub-tier sources they employ.

## D. CYBERSECURITY

Suppliers are expected to safeguard and protect information and assets entrusted to them, and information generated or developed by them, in support of our programs from cyber intrusions, unauthorized access, use, modification, disclosure or destruction.

## E. ARTIFICIAL INTELLIGENCE

We are committed to the ethical use of artificial intelligence. We expect our suppliers to review and support the [U.S. Department of Defense Ethical Artificial Intelligence Principles](#) when developing or using artificial intelligence solutions on our behalf.

## II. SOCIAL Human Rights

We expect our suppliers to treat people with respect and dignity, encourage diversity, remain receptive to diverse opinions, promote equal opportunity for all and foster an inclusive and ethical culture.

## A. PEOPLE AND RESPECT

We expect our suppliers to:

- Value the differences that make people unique
- Be inclusive, supportive and receptive to different ideas and opinions
- Provide a work environment free from discrimination and all forms of harassment and other abusive conduct
- Provide equal employment opportunities to 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, so long as the essential functions of the job can be competently performed with or without reasonable accommodation

## B. CHILD LABOR

We expect our suppliers to ensure that illegal child labor is not used in the performance of their work. The term “child” refers to any person under the minimum legal age for employment where the work is performed.

## C. HUMAN TRAFFICKING, FORCED LABOR AND MODERN SLAVERY

Suppliers must ensure all employment is freely chosen and prohibit human trafficking, forced labor and modern slavery. Suppliers must refrain from violating the rights of others and address any adverse human rights impacts of their operations. Suppliers must educate and train employees on prohibited trafficking activities and discipline employees found to have committed these activities. We expect suppliers to comply with all applicable laws in the countries in which they operate, including those related to wages, benefits and working hours.

Specifically, suppliers will be prohibited from the following in all contracts:

- Destroying, concealing or confiscating identity or immigration documents
- Using recruiters that do not comply with labor laws of the country in which the recruiting takes place, including those related to wages, benefits and working hours
- 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 adequate security arrangements if needed
- Failing to provide employment contracts and other documentation in an 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
- Failing to investigate and protect employees suspected of being trafficking victims

## Employment Practices

We expect our suppliers to use appropriate recruiting techniques and professional companies that comply with national, international and local labor laws where recruitment occurs. Recruitment fees or other similar fees charged to workers and payable to the employer, recruiting agent or sub-agent are strictly prohibited.

We expect suppliers to respect workers’ rights to associate freely and communicate openly with management regarding working conditions without fear of harassment, intimidation, penalty, interference or reprisal.

## A. HARASSMENT

We expect our suppliers to ensure that their employees are afforded an employment environment that is free from physical, psychological and verbal harassment or other abusive conduct.

## B. NONDISCRIMINATION

We expect our suppliers to provide equal employment opportunity to their 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, so long as the essential functions of the job can be competently performed with or without reasonable accommodation.

## C. SUBSTANCE ABUSE

We expect our suppliers to maintain a workplace that is free from illegal use, possession, sale or distribution of controlled substances.

## D. WAGES

Suppliers must comply with appropriate working hour requirements, including overtime, minimum wages, breaks, rest periods and legally mandated benefits, as established by national law, relevant collective agreements or international standards.

## E. WORKERS’ RIGHTS TO ORGANIZE

Suppliers should respect the rights 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.

## F. WORKING CONDITIONS, HEALTH AND SAFETY

We expect suppliers to provide humane working conditions and ensure all employees have access to clean and safe water resources. We expect our suppliers to comply with all applicable health and safety laws, regulations and directives. Suppliers should protect the health, safety and welfare of their employees, visitors and others who may be affected by their activities. Suppliers should ensure compliance with all applicable occupational health and safety laws and regulations, including requirements that address occupational safety, emergency preparedness, occupational injury and illness prevention, industrial hygiene,



physically demanding work, ergonomics, machine safeguarding, sanitation, food and housing.

## Career Management and Training

We expect suppliers to actively engage in workforce skills development, career planning and performance evaluation. Regular employee training, such as on-the-job programs and self-improvement courses, should be offered, along with required certification training programs.

## III. ENVIRONMENT AND SUSTAINABILITY

We are committed to protecting the environment. We expect our suppliers to share our commitment and integrate proactive practices to minimize their environmental impact and waste, consider the full lifecycle of products or services, actively manage risks across their operations, products and supply chain and work for continuous improvement. We expect our suppliers to partner with us to be good stewards of the environment by operating in a manner that actively manages risk, conserves natural resources and protects the environment. We expect our suppliers to establish and apply a systematic approach to managing environmental issues, including potential risk from regulatory noncompliance, reputational loss and opportunities for business growth through operational and product stewardship.

## IV. CORPORATE RESPONSIBILITY

### Ethics Program Expectations

#### A. 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 raise concerns directly with SAIC through the communication channels provided below. We prohibit retaliation against anyone

for raising a concern in good faith or for participating in an investigation of possible wrongdoing and expect our suppliers to do the same.

#### B. ETHICS POLICIES

We expect our suppliers to implement management systems commensurate with the size and nature of their business to support compliance with laws, regulations and expectations related to or addressed expressly within this document.

### Supplier Quality

Suppliers must ensure that their work products meet SAIC quality standards and conform to applicable specifications, laws and regulations. We expect our suppliers to have in place a quality assurance process to identify defects, implement corrective actions and facilitate the delivery of a product whose quality meets or exceeds contract requirements.

#### A. COUNTERFEIT PARTS

We expect our suppliers to develop, implement and maintain appropriate methods and processes 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, exclude such parts from the delivered product and provide notification to recipients of a product containing counterfeit parts when warranted.

### Consequences for Violating these Expectations

In the event of a violation of any of the above expectations, SAIC may pursue corrective action to remedy the situation. In the case of a violation of a law or regulation, we may be required to report those violations to the appropriate authorities. We reserve the right to terminate our relationship with any supplier under the terms of the existing procurement or purchasing contract.

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SAIC takes all reports about unethical or unlawful behavior seriously, listens carefully to concerns, conducts investigations objectively and takes appropriate corrective actions when warranted. If you have any questions regarding the content of this Supplier Code of Conduct or if you believe that SAIC or any of its employees or agents have acted improperly or unethically, you may report your concerns to SAIC at <https://www.saic.com/who-we-are/about-saic/ethics>.

By signing below, the Supplier understands and agrees to comply with the Supplier Code of Conduct and agrees to flow down the essence of this Supplier Code of Conduct to any lower-tier subcontracting partner. Any violation of this code may be cause for terminating the supplier's relationship with SAIC.

Signature of Authorized Representative: \_\_\_\_\_ Date: \_\_\_\_\_

Supplier Name: \_\_\_\_\_