



LTC Solutions Subcontractor and Supplier Code of Conduct

Caring About Our People and Our Customers

LTC is committed, from the top down, to ensuring that employees are treated honestly and fairly. We will provide the best possible environment for job execution and career growth and promote teamwork and ethical approaches in our everyday operations. We employ and work with people from a range of backgrounds and cultures and are committed to a workplace free of discrimination.

At LTC Solutions, LLC (LTC) we value the partnership we have with our customers. Customer requirements are our top priority. LTC's approach to customer support ensures that:

- We will compete for all contracts in a lawful and ethical manner.
- We will be fair and honest with our customers.
- We will stand behind our work and our employees to ensure the customer receives the highest quality service and qualified professionals to perform the work.
- We will work in an ethical and equitable manner with our subcontractors and business partners to ensure our customers receive the support they expect, at a reasonable price
- We will perform all contractual work in compliance with contract terms.

To that end we are providing this Subcontractor and Supplier Code of Conduct as a guide related to expectations on the delivery of services to LTC and/or its ultimate customers, including the United States Government ("Government").

1. Compliance with the Law

Supplier will fully comply with all applicable laws and regulations, including local laws and regulations outside the United States where the Supplier conducts business or maintains a place of business.

2. Records

Supplier will create and maintain complete and accurate records and not alter any records to conceal or misrepresent the underlying transaction to which the record pertains. Suppliers performing as US Government Contractors must retain records in compliance with federal laws and regulations.

3. Human Rights

a. Employment Practices/Fair Treatment of Employees

We will not tolerate hostility, discrimination, harassment, or other behaviors and beliefs that manifest themselves in ways that would jeopardize our corporate values or our employees. Supplier is expected to treat all people with respect, encourage diversity, promote equal opportunity for all, and foster an inclusive and ethical culture.



b. Child Labor

Supplier will ensure that illegal child labor (as that term is defined in the location where the work is to be performed) is not used in the performance of work on behalf of LTC Solutions.

c. Combatting Trafficking in Persons

Supplier shall comply with applicable regulations prohibiting human trafficking including and comply with all applicable local laws in the location where the work is to be performed. Suppliers shall educate employees on prohibited activities, discipline employees who violate applicable law, and notify the contracting officer of violations and action taken against employees responsible for such violations. Supplier shall also notify LTC of violations under an LTC contract. The following activities are prohibited:

- Destroying, concealing, or confiscating identity or immigration documents; and
- Using misleading or fraudulent tactics in recruiting; and
- Charging employee recruitment fees
- Failing to interview and protect employees suspected of being trafficking victims.

4. Anti-corruption

Suppliers shall comply with the anti-corruption laws, directives and regulations that govern operations in the countries in which they do business, including without limitation the US Foreign Corrupt Practices Act and the UK Bribery Act. Supplier is required to refrain from offering or making, or authorizing or enabling any third party to offer or make on Supplier's behalf, any improper payments of money or any other thing of value to government officials, political parties, or candidates for public office. Facilitating payments, intended to expedite or ensure performance of routine governmental actions, are also prohibited regardless of whether they are permitted under local law. We expect supplier will conduct appropriate due diligence to prevent and detect corruption in its business arrangements and contracts.

5. Business Courtesies

The exchange of gifts or business courtesies may not be used to advance any improper purpose or obtain an unfair competitive advantage. Supplier must ensure that the offering or receipt of any gift or business courtesy is permitted by law and regulation, and that these exchanges do not violate the rules and standards of the recipient's organization and are consistent with reasonable marketplace customs and practices. Any gifts, entertainment or other accommodation must be professional in nature and not excessive in cost.



6. Anti-Trust

Supplier must not fix prices, or participate in bid rigging or cartel activity, nor exchange current, recent, or future pricing information with competitors. Suppliers must not share other sensitive or non-public information (“Protected Information”) with competitors.

7. Money-Laundering

Supplier shall maintain appropriate mechanisms to ensure neither it nor its employees use Supplier’s relationship with LTC to disguise the sources of illegally obtained funds.

8. Conflict of Interest

Suppliers must avoid all actual or apparent conflicts of interest in its dealings with LTC. We expect supplier to notify LTC if an actual or potential conflict of interest arises, whether personal or organizational with respect to LTC’s business interests.

9. Protection of Information

a. Confidential and Proprietary Information

Supplier will properly protect sensitive information, including classified, confidential, proprietary, and personally identifiable information.

b. Intellectual Property Protection

Supplier is expected to comply with all laws governing use, disclosure and protection of intellectual property, including patents, copyrights, trademarks and service marks.

c. Information Security

Supplier is expected to utilize appropriate physical and electronic security measures to protect the information of others, including personal information, from unauthorized access, destruction, use, modification, and disclosure. Suppliers must comply with all applicable data privacy laws.

d. Procurement Integrity

Supplier is expected to comply with the Procurement Integrity Act. Possession or use of a competitor’s business rates, proprietary information or Government source selection information can be in violation of this act and compromise the integrity of the procurement process.

10. Environmental Health and Safety

We expect our suppliers to comply with all applicable environmental, health and safety laws, regulations, and directives. Suppliers should protect the health, safety, and welfare of its employees and other impacted individuals or entities.



11. Trade Compliance

a. Import/Export

Supplier is expected to ensure its business practices are in accordance with all applicable laws, regulations, and directives governing the import or export of parts, components, technical data, and defense items or services.

b. Anti-boycott

Consistent with the requirements of the 1977 Export Administration Act and the 1976 Tax Reform Act, Supplier must not participate in, cooperate with, submit to or otherwise further the cause of any unsanctioned boycott.

c. Conflict minerals

Suppliers must adhere to federal laws and regulations requiring reporting companies to make specialized disclosure and conduct due diligence in order to meet its obligations to report or certify as to the use of conflict minerals that may have originated in the Democratic Republic of the Congo or adjoining country.

12. Counterfeit Parts

Suppliers will develop, implement, and maintain policies, procedures, and methods to detect and avoid counterfeit electronic parts. Supplier will promptly notify LTC and any recipients of counterfeit parts when appropriate. Supplier will hold those in its supply chain accountable for the same obligations with respect to work performed for LTC.

13. Ethics Program

We expect Supplier to comply with FAR 52.203-13 as applicable, and commensurate with the size and nature of its business, to have effective systems in place to comply with laws, regulations, and the standards set forth in this Code. It is important to maintain high ethical standards and integrity. We encourage Supplier to implement its own written code of conduct and flow down the principles of that code to its suppliers and subcontractors. Additionally, we expect supplier to provide employees reasonable avenues to raise legal or ethical concerns without fear of retaliation and take preventative or correction action when warranted.

14. Consequences for Violating Code

LTC reserves the right to pursue corrective action to remedy any violation of any of these standards. In the case of a violation of law or regulation, LTC may be required to report such violations to the proper authorities.