



At Paragon, we value:

Our position of **trust** with our customers – its foundation in partnership, mutual respect, fairness and commitment to mission, is fundamental to our success in each business engagement. This trust is based on our unsurpassed dedication to program execution.

Our **people** – our passion for mission, intellectual capital, creativity and ability to lead, make our reputation and ensure the success of our company. Talent and teamwork make our performances successful.

Our **quality** – in all that we do, through our quest for excellence, value creation and innovation, we seek to deliver the best value for our customers and improve the elements of our business. We understand the mission and we focus on the ideas and solutions that drive progress and success.

SUPPLIER CODE OF CONDUCT

This supplier Code of Conduct uses these values as our guide, while providing specific Supplier Expectations to further our shared commitment to doing business the right way every day.

FAIR TREATMENT AND COMPETITION

I. Human Rights

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

A. Fair Treatment of Employees

No Harassment - We expect our suppliers to ensure a work environment for their employees that is free from physical, psychological, and verbal harassment, or other abusive conduct.

Non-discrimination - We expect our suppliers to provide equal employment opportunity 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.

Health & Safety - 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 people, visitors, and others who may be affected

by their activities.

B. Child Labor

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

C. Human Trafficking

Suppliers must adhere to regulations prohibiting human trafficking and comply with all applicable local laws in the country or 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, and notify Paragon or the contracting officer of violations against employees, including:

Destroying, concealing, or confiscating identity or immigration documents;

Using misleading or fraudulent tactics in recruiting or charging employee recruitment fees;

Failing to provide adequate housing or provide return transportation upon the end of an employee’s deployment on a U.S. government contract or subcontract; and

Failing to interview and protect employees suspected of being trafficking victims.

II. Information Protection

A. Confidential/Proprietary Information

Suppliers must properly protect sensitive information, including classified, confidential, proprietary, and personal information. Information should only be used and shared for the business purpose for which it was provided.

B. Intellectual Property

We expect our suppliers to respect our intellectual property rights and those of third parties, including protection against disclosure, patents, copyrights, and trademarks.

C. Information Security

Suppliers must protect the information of others, including personal information, from unauthorized access, destruction, use, modification, and disclosure, through use of appropriate physical and electronic security procedures. Suppliers must comply with all applicable data privacy laws.

D. Procurement Integrity

Possession or use of a competitor’s business rates, proprietary information or Government source selection information can violate law and compromise the integrity of the procurement process. We are committed to conducting business in accordance with laws such as the Procurement Integrity Act and expect our suppliers to do so as well.

III. Fair Competition/Anti-Trust

Our suppliers must adhere to applicable anti-trust or anti-competition laws and promote ethical business practices. Suppliers must not fix prices or rig bids with their competitors, and they must not exchange current, recent, or future pricing information with competitors.

IV. Conflict of Interest

We expect our suppliers to avoid all conflicts of interest and situations giving the appearance of a potential conflict of interest in their dealings with Paragon. We expect our suppliers to notify Paragon if an actual or potential conflict of interest arises with respect to Paragon’s business interests.

V. Gifts/Business Courtesies

We expect our suppliers to compete on the merits of their products and services. The exchange of business courtesies must not be used to gain an unfair competitive advantage. In every business relationship, our suppliers must ensure that the offering or receipt of 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. Any gifts, entertainment or other

accommodation must be professional in nature and not excessive in cost. A gift that could reasonably be perceived to influence business can damage both Paragon and our supplier's reputations and should not be given.



ADHERENCE TO LAWS AND REGULATIONS

I. Maintain Accurate Records

We expect suppliers to create accurate records, and not to alter any record 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. Suppliers performing as US Government contractors (whether direct or indirect) must retain records in compliance with federal laws and regulations.

II. Anti-Corruption

Our suppliers must comply with the anti-corruption laws, directives and/or regulations that govern operations in the countries in which they do business, such as the U.S. Foreign Corrupt Practices Act (FCPA) and the U.K. Bribery Act.

Our suppliers, and their agents, should refrain from offering or making any improper payments of money or giving anything of value to government officials, political parties, candidates for public office, or other persons. Our suppliers should not make facilitating payments to expedite or secure performance of a routine governmental action like obtaining a visa or customs clearance, even in locations where such

activity may not violate local law. Personal safety payments are permitted where there is an imminent threat to health or safety.

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, and/or promise of monies 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 may not violate local law.

III. Supply Chain Responsibility

A. Export/Import Control

We expect our suppliers to ensure that their business practices are in accordance with all applicable laws, directives and regulations governing the import or export of parts, components, and technical data.

B. Conflict Minerals

Suppliers must adhere to federal laws and regulations requiring reporting 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 (DRC) or an adjoining country. Conflict minerals include cassiterite, columbite-tantalite, gold and wolframite, or their derivatives (tantalum, tin, and tungsten). We expect our suppliers to develop due diligence processes to meet our obligations to ensure that all products are responsibly manufactured.

C. Environment

Our suppliers should operate in a manner that actively manages risk, conserves natural resources, and protects the environment.

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 their people, visitors, and others who may be affected by their activities.

D. Sub-tier Suppliers

Suppliers shall assure extension of the requirements and objectives of this Code of Conduct to all sub-tier sources they engage.

QUALITY SERVICES AND PRODUCTS

I. Contract Terms

Paragon's contracts, subcontracts and supplier contracts often identify specific performance standards. When these standards direct the use of specific components, materials and/or specific qualifications of labor employed in products and services, our suppliers must adhere to these requirements and other flow down clauses and terms of our contracts.

II. Counterfeit Parts

We expect our suppliers to develop, implement, and maintain methods and processes appropriate to their products to minimize the risk of introducing counterfeit parts and materials into contract deliverables. Effective processes should be in place to detect counterfeit parts and materials, provide notification to recipients of counterfeit product(s) when warranted, and exclude them from contract deliverables.

REPORTING OF CONCERNS

We expect our suppliers to provide their employees with avenues for raising legal or ethical issues or concerns without fear of retaliation, and to take action to prevent, detect, and address any incidents of retaliation.



ETHICS & COMPLIANCE

Our suppliers must adhere to Paragon's Supplier Code of Conduct or have their own ethics and compliance program that meets the requirements of FAR 52.203-13 and is commensurate with the size and nature of their business. Such a program should:

Include management systems, tools and processes that ensure compliance with applicable laws and regulations;

Promote a commitment to ethical business practices;

Provide training to employees on compliance requirements; and

Conform to the expectations set forth in this Supplier Code of Conduct.

CONTACT US

Employees of our suppliers may raise concerns through Paragon's Ethics Office:

ethics@paragonforce.com