Leidos Supplier Code of Conduct
Introduction

Our suppliers are vital to the success of Leidos. Our goal is to partner with responsible companies that share both our values and our commitment to high ethical standards. The Leidos Supplier Code of Conduct (the Code) outlines our expectations for suppliers and their employees, personnel, agents, and subcontractors. Suppliers are expected to adhere to the Code and uphold our value of integrity while conducting business with and/or on behalf of Leidos.

Message From Bob Gemmill

Colleagues,

Leidos is committed to conducting business with uncompromising integrity. This is core to our values, foundational to our culture, and absolutely critical for doing business with our customers. This commitment is embedded in our Supplier Code of Conduct (the Code), which outlines our expectations for suppliers and their employees, personnel, agents, and subcontractors.

At Leidos, we expect our suppliers to understand, foster, and mirror the ethical conduct we expect from our employees in all business transactions. We do not cut corners on ethics, quality, or safety in pursuit of our business objectives, and we are all accountable.

We are part of a complex global supply chain with a wide range of vulnerabilities. We understand the impact that our procurement decisions could have on our company and reputation, as well as our customers, the environment, our communities, and all of our stakeholders. Our supplier base encompasses large and small businesses around the globe operating across markets and delivering solutions to a wide range of customers. This diverse set of suppliers is essential to our success, and transparent and ethical behavior from our suppliers is required for us all to thrive.

Compliance with human rights, health and safety, anti-discrimination, environmental protection, and any other applicable laws and regulations is the starting point. Our goal is to partner with responsible companies that share both our values and our commitment to high ethical standards.

Thank you for your efforts to help Leidos meet our business objectives with integrity.
Everything we do is built on a commitment to do the right thing for our customers, our people, and our community. Our Mission, Vision, and Values guide the way we do business.

Mission
Leidos makes the world safer, healthier, and more efficient through technology, engineering, and science.

Vision
Become the global leader in the development and application of technology to solve our customers’ most demanding challenges.

Engage, develop, and empower our diverse and valued people to foster a culture of creativity and growth.

Strengthen our communities through volunteerism, sustainable operations, and the advancement of equality.

Values

<table>
<thead>
<tr>
<th>Values</th>
<th>Definition</th>
</tr>
</thead>
<tbody>
<tr>
<td>Integrity</td>
<td>Having the courage to make tough ethical decisions, taking pride in our work, being transparent with our team, and being respectful of everyone.</td>
</tr>
<tr>
<td>Agility</td>
<td>Being flexible, adaptive, and resilient. It is our ability to think and act small enough to capitalize on our size and quickly learn and create value to our advantage.</td>
</tr>
<tr>
<td>Collaboration</td>
<td>Being interdependent and interpersonally engaging to meet shared objectives. It is about understanding others, empathizing with them, being a good listener connected with each other.</td>
</tr>
<tr>
<td>Innovation</td>
<td>Constantly learning and exploring new ideas and opportunities to improve our capability and resources for everyone.</td>
</tr>
<tr>
<td>Commitment</td>
<td>Being accountable, taking ownership, modeling respect, building trust, and operating with a sense of urgency for our customers and partners.</td>
</tr>
</tbody>
</table>

General Disclaimer
Our suppliers are required to act in accordance with all applicable federal, international, state and local laws and regulations. In the event of a conflict, suppliers must first adhere to applicable laws and regulations, then the contract terms, followed by the Code.

Code Compliance
Leidos has operations around the world, and just as our employees must be aware of all federal, international, state and local laws and regulations that might apply to the work we do, so must our suppliers. These rules include trade and sanction laws and regulations that can be complex, and the business activities and parties they cover can change quickly. Our suppliers shall possess a governance structure and implement effective management systems to facilitate compliance with all applicable laws and regulations and to promote continuous understanding and improvement with respect to the expectations set forth in the Code.

Leidos reserves the right to pursue corrective action to remedy nonconformance with the Code. Any violation of the Code may jeopardize a supplier’s business relationship with Leidos up to and including termination. In the event of a violation of any applicable law or regulation, Leidos may be required to report such violations to the proper authority.

Fair Competition
As part of the obligations to comply with applicable laws and regulations, our suppliers are required to comply with applicable antitrust and competition laws that prohibit agreements between competitors that affect prices, costs, terms or conditions of sale.
At Leidos, our mission and values reflect an unwavering respect for human dignity and fundamental human rights. We condemn human rights abuses and adhere to the principles of the International Bill of Human Rights and the International Labor Organization’s Declaration on Fundamental Principles and Rights at Work. We have a responsibility to respect human rights in the operation of our business, and we adhere to the United Nations framework to protect and respect human rights and to remedy human rights abuses. We expect suppliers to observe similar standards respecting human rights.

Human Trafficking
Leidos fully supports the elimination of human trafficking and slavery from all global levels of the supply chain and does not tolerate any trafficking of persons. If performing under a subcontract in support of a Leidos prime contract with the U.S. Government, suppliers must notify Leidos immediately if any of its employees, subcontractors or agents have engaged in any of the acts or omissions set forth in FAR 52.222-50(b).

Child Labor
SUPPLIER ROLE
Our suppliers shall not employ any persons under the minimum legal age for employment where the work is performed.

Enslaved Labor
SUPPLIER ROLE
Our suppliers shall ensure that no forced labor, including but not limited to bonded, indentured and involuntary prison, or enslaved labor is used in their supply chain.

Human Rights

Enslaved Labor
Our suppliers shall ensure that no forced labor, including but not limited to bonded, indentured and involuntary prison, or enslaved labor is used in their supply chain.

SUPPLIER ROLE
Our suppliers shall not engage in or allow any form of human trafficking or commercial exploitation, including the sexual exploitation of men, women or children. Each supplier must educate its employees on prohibited trafficking activities, discipline employees found to have violated the law or rules.
Employment Practices

Discrimination

**SUPPLIER ROLE**
Our suppliers shall provide equal opportunities and shall not discriminate on the basis of race, color, age, national origin, ethnicity, ancestry, sexual orientation, gender identity or expression, medical condition, mental or physical disability, marital status, family structure, genetic information, military or veteran status, religion, political affiliation, union membership, or any other status protected by national or local law.

Harassment and Abuse

**SUPPLIER ROLE**
Our suppliers shall commit to and maintain employee environments that are free from harassment and abuse, including but not limited to physical, verbal, and mental abuse, psychological harassment, mental and physical coercion, and sexual harassment.

Wages, Benefits, and Hours

**SUPPLIER ROLE**
Our suppliers are expected to pay their workers at least the minimum compensation required by applicable local law and regulation, and provide all legally mandated benefits in a timely manner.

In addition, our suppliers must operate in full compliance with all applicable labor laws in regards to wages, work hours, vacation time, overtime, and holidays.

Substance Abuse and Drug Free Workplace

**SUPPLIER ROLE**
Our suppliers shall implement and enforce policies and procedures that prohibit employees from using, possessing, or selling (illegal drugs, alcohol), or other controlled substances, or misusing medications while performing job functions.

Immigration Laws Compliance

**SUPPLIER ROLE**
Our suppliers shall only engage workers who have a legal right to work.
Improper Payments
Our suppliers must comply with the U.S. Foreign Corrupt Practices Act and other similar applicable anti-corruption laws [e.g., the U.K. Bribery Act], directives, and/or regulations that govern operations in the countries in which they do business, regardless of local customs.

Suppliers must not give, promise, offer, or authorize anything of value (including kickbacks, favors, hospitality, gifts, gratuities, entertainment, travel, political contributions, charitable donations or other business courtesies) to any government official or commercial partner that influences any action, or that violates any duty owed by the official or partner to his or her employer to gain an improper advantage for purposes of obtaining or retaining business for Leidos or any other person. Additionally, our suppliers must not retain a third party to engage in such activity on our behalf.

This obligation includes a prohibition on facilitating payments intended to expedite or secure performance of a routine governmental action like obtaining a visa or customs clearance, except in situations where there is an imminent threat to personal health or safety.

Supplier Role
Our suppliers shall neither engage in nor tolerate association with any form of corruption, fraud, bribery, extortion, or embezzlement.

Conflict of Interest
Our suppliers shall avoid all conflicts of interest or situations including those that give the appearance of a potential conflict of interest in their dealings with Leidos.

Due Diligence
Our suppliers shall proactively undertake appropriate due diligence and monitoring to prevent and detect corruption in all business arrangements including partnerships, joint ventures, offset agreements, and the engagement of third parties.

Suppliers must maintain detailed and accurately-recorded payments in accordance with generally accepted accounting principles.
Information Protection

Confidential/Proprietary Information

Our suppliers shall have a system in place to enable proper and legal handling of sensitive information, including confidential, proprietary, and personal information (“Information”).

All such Information should not be used for any purpose (e.g., advertisement, publicity, and the like) other than for the business purpose for which it was provided, unless there is prior written authorization from Leidos or, where applicable, from the owner of such Information.

Suppliers shall ensure that this obligation is extended to all company employees as well as all sub-tier suppliers they employ on behalf of Leidos.

Data Privacy

Our suppliers must comply with all applicable laws, associated regulatory requirements, and applicable contractual requirements when accessing, collecting, storing, processing, disclosing, transferring and/or sharing any Information (e.g. personal, proprietary, and confidential information).

Suppliers shall ensure this obligation is extended to all company employees as well as all sub-tier suppliers they employ on behalf of Leidos.

Intellectual Property

Our suppliers shall comply with all laws governing intellectual property rights assertions, including protection against disclosure, patents, copyrights, trademarks, and service marks.

Suppliers shall ensure that this obligation is extended to all company employees as well as all sub-tier suppliers they employ on behalf of Leidos.

Cybersecurity

Our suppliers are expected to safeguard and protect all information entrusted to them and information generated or developed by them in support of our programs from cyber intrusions, unauthorized access, destruction, use, modification, or disclosure, through appropriate physical and electronic security procedures.

Our suppliers shall assure extension of this requirement to all sub-tier sources they employ on behalf of Leidos.

Insider Trading

Our suppliers must not use any of the information, specifically material, non-public information, obtained in the course of performing under a contract with Leidos as the basis for trading or for enabling others to trade in the securities of Leidos or those of any other company.
Environmental Considerations

Leidos is committed to using our time and resources to support people, enrich communities, and protect the environment and comply with applicable laws and regulations.

We expect our suppliers to share our commitment by responding to challenges posed by climate change and working to protect the health and safety of their people and the environment.

Environmental Laws

Our suppliers must comply with all applicable environmental laws, regulations, standards, notices, and reporting requirements.

Health and Safety

Our suppliers shall provide a safe and healthy work environment in compliance with all applicable laws and regulations related to occupational health and safety.

Suppliers should have an occupational health and safety management system that aligns with recognized safety standards (e.g., ISO 45001).

Emergency Preparedness

Our suppliers shall develop and implement a proactive process to take reasonable steps to prepare for, prevent, and respond to the potential for an emergency that could negatively impact their supply chain or business operations (e.g., infectious diseases, weather or natural disasters, etc.).

Sustainability

Our suppliers shall be prepared to identify, monitor and minimize greenhouse gas (GHG) emissions and energy consumption in their operations.

At Leidos, we closely monitor and manage our emissions to meet ambitious GHG reduction targets and help mitigate climate change. We far exceeded our 2020 GHG reduction target and are committed to further reductions by 2030, but we can’t do it alone. We will collaborate with our suppliers to identify GHG reduction opportunities and expect our suppliers to disclose complete, consistent and accurate GHG emissions and energy data for products and services provided to Leidos.

A CIRCULAR ECONOMY is an economic model that is focused on minimizing waste and the demand for natural resources by encouraging continuous reuse of materials.
Global Trade Compliance

Security

SUPPLIER ROLE
Our suppliers are encouraged to implement practices and procedures to ensure the security of their supply chains in accordance with the Customs-Trade Partnership Against Terrorism initiative of the United States Department of Homeland Security.

International Trade Compliance

SUPPLIER ROLE
Our suppliers shall ensure that their business practices are in accordance with all applicable export control and sanctions compliance laws, regulations, executive orders, and directives ("trade compliance laws") governing the export, re-export, transfer, retransfer, and import of commodities and information, including parts, components, and/or technical data.

The trade compliance laws include, but are not limited to, the International Traffic in Arms Regulation ("ITAR"), the Export Administration Regulations ("EAR"), and the Foreign Assets Control Regulations ("FACR"). Suppliers shall maintain and provide when requested truthful and accurate information and obtain export licenses and/or consents where necessary. Suppliers shall not engage in business dealings with entities and partners that are prohibited under applicable trade compliance laws, including but not limited to, Debarred Parties under the ITAR, Denied Persons under the EAR, and Specially Designated Nationals under FACR.

Conflict Minerals

SUPPLIER ROLE
Our suppliers shall comply with all applicable laws and regulations requiring reporting and conducting due diligence on the use of conflict minerals in our supply chain.

We expect our suppliers to perform due diligence by proper identification of products that contain conflict minerals and validating the country of origin of these minerals. Conflict minerals include, but are not limited to, cassiterite, columbite-tantalite, gold and wolframite, or their derivatives (tantalum, tin, and tungsten).

Anti-Boycott

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

Leidos Supplier Code of Conduct
Quality

Our suppliers must ensure their work product meets Leidos’ quality standards. We expect our suppliers to have in place quality assurance processes to identify defects and implement corrective actions, and to facilitate the delivery of a product whose quality meets or exceeds the contract requirements. Quality is enhanced through measures that ensure supplier diversity and maintaining accurate business records.

Counterfeit Parts

**SUPPLIER ROLE**

Our suppliers shall implement policies and procedures that ensure their supply chain is secure from tampered or counterfeit parts and adhere to all contractual requirements.

Effective processes should be in place to detect counterfeit parts and materials, provide notification to recipients of counterfeit products when warranted, and exclude them from the delivered product.

Maintain Accurate Business Records

**SUPPLIER ROLE**

Our suppliers must ensure their work product meets Leidos’ quality standards. We expect our suppliers to have in place quality assurance processes to identify defects and implement corrective actions, and to facilitate the delivery of a product whose quality meets or exceeds the contract requirements. Quality is enhanced through measures that ensure supplier diversity and maintaining accurate business records.

Counterfeit Parts

**SUPPLIER ROLE**

Our suppliers shall implement policies and procedures that ensure their supply chain is secure from tampered or counterfeit parts and adhere to all contractual requirements.

Effective processes should be in place to detect counterfeit parts and materials, provide notification to recipients of counterfeit products when warranted, and exclude them from the delivered product.

Maintain Accurate Business Records

**SUPPLIER ROLE**

Our suppliers shall maintain accurate business records for honesty and transparency and to make such records available when subject to an audit of records.

Our shareholders, business partners, customers, government officials, and the public need to rely on the accuracy and completeness of our disclosures and business records. When a record is no longer needed to conduct current business, records should still be retained based on the applicable retention requirements and regulations in place.

Ethics Program

Consequences for Violating the Code

While Leidos suppliers are expected to self-monitor and demonstrate their compliance with the Code, Leidos may audit suppliers to confirm compliance with the Code.

**SUPPLIER ROLE**

In such event, the supplier is required to co-operate by providing information, documents and access to staff, as Leidos reasonably requires.

Suppliers that behave in a manner that is unlawful or inconsistent with the Code or any Leidos policy may jeopardize their business relationship with Leidos up to and including termination. In the event of a violation of law or regulation, Leidos may be required to report such violations to proper authorities.

Report Concerns

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.

Our suppliers shall support whistleblowers that raise concerns of suspected legal or ethical violations and should not tolerate retaliation. Our suppliers shall have a process for allowing any potential whistleblower who is uncomfortable reporting improper activity, to have the option of reporting a concern anonymously, if not otherwise prohibited by law.

**SUPPLIER ROLE**

Our suppliers shall support whistleblowers that raise concerns of suspected legal or ethical violations and should not tolerate retaliation. Our suppliers shall have a process for allowing any potential whistleblower who is uncomfortable reporting improper activity, to have the option of reporting a concern anonymously, if not otherwise prohibited by law.

Termination. In the event of a violation of law or regulation, Leidos may be required to report such violations to proper authorities.

Report Concerns

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.

Our suppliers shall support whistleblowers that raise concerns of suspected legal or ethical violations and should not tolerate retaliation. Our suppliers shall have a process for allowing any potential whistleblower who is uncomfortable reporting improper activity, to have the option of reporting a concern anonymously, if not otherwise prohibited by law.

**SUPPLIER ROLE**

In such event, the supplier is required to co-operate by providing information, documents and access to staff, as Leidos reasonably requires.

Suppliers that behave in a manner that is unlawful or inconsistent with the Code or any Leidos policy may jeopardize their business relationship with Leidos up to and including termination. In the event of a violation of law or regulation, Leidos may be required to report such violations to proper authorities.

Report Concerns

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.

Our suppliers shall support whistleblowers that raise concerns of suspected legal or ethical violations and should not tolerate retaliation. Our suppliers shall have a process for allowing any potential whistleblower who is uncomfortable reporting improper activity, to have the option of reporting a concern anonymously, if not otherwise prohibited by law.

**SUPPLIER ROLE**

In such event, the supplier is required to co-operate by providing information, documents and access to staff, as Leidos reasonably requires.

Suppliers that behave in a manner that is unlawful or inconsistent with the Code or any Leidos policy may jeopardize their business relationship with Leidos up to and including termination. In the event of a violation of law or regulation, Leidos may be required to report such violations to proper authorities.

Report Concerns

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.

Our suppliers shall support whistleblowers that raise concerns of suspected legal or ethical violations and should not tolerate retaliation. Our suppliers shall have a process for allowing any potential whistleblower who is uncomfortable reporting improper activity, to have the option of reporting a concern anonymously, if not otherwise prohibited by law.

**SUPPLIER ROLE**

In such event, the supplier is required to co-operate by providing information, documents and access to staff, as Leidos reasonably requires.

Suppliers that behave in a manner that is unlawful or inconsistent with the Code or any Leidos policy may jeopardize their business relationship with Leidos up to and including termination. In the event of a violation of law or regulation, Leidos may be required to report such violations to proper authorities.

Report Concerns

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.

Our suppliers shall support whistleblowers that raise concerns of suspected legal or ethical violations and should not tolerate retaliation. Our suppliers shall have a process for allowing any potential whistleblower who is uncomfortable reporting improper activity, to have the option of reporting a concern anonymously, if not otherwise prohibited by law.

**SUPPLIER ROLE**

In such event, the supplier is required to co-operate by providing information, documents and access to staff, as Leidos reasonably requires.

Suppliers that behave in a manner that is unlawful or inconsistent with the Code or any Leidos policy may jeopardize their business relationship with Leidos up to and including termination. In the event of a violation of law or regulation, Leidos may be required to report such violations to proper authorities.