




LS Technologies, LLC

Supplier Code of Conduct

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1.0 INTRODUCTION

LS Technologies, LLC (LST) has established a positive reputation that has been enhanced and safeguarded over the years by our culture and core values, including those of integrity, excellence, and commitment. Our reputation and continued success are dependent on conducting business ethically. We therefore expect our subcontractors, vendors, partners, and consultants (“Suppliers”) to adhere to same these values and apply them when doing business with LST.

Although not intended to address every potential situation involving our business, this document outlines the required standards of conduct expected of Suppliers. The content provided is not intended to conflict with or modify the terms and conditions of any subcontract, task order, purchase order, or other applicable agreement between LST and its suppliers. In the event of any conflict, applicable law or regulation shall take precedence, followed by the terms and conditions of any applicable agreement, followed by the terms of this Code.

2.0 ETHICAL BUSINESS PRACTICES

Suppliers are required to comply with both the letter and spirit of all applicable laws and regulations, including those addressing corruption, kickbacks, bribery, and other prohibited business practices.

Commensurate with the size and nature of its business, Supplier will comply with the Contractor Code of Business Ethics and Conduct (FAR 52.203-13 and AMS 3.2.5-13, as applicable) and have effective systems in place to comply with standards set forth in this Code. We encourage and expect Supplier to:

- implement its own written code of business ethics and conduct;
- provide its employees and suppliers with appropriate training on its business ethics and compliance program; and
- set standards and procedures to facilitate timely discovery of improper conduct

3.0 WORK ENVIRONMENT AND EMPLOYMENT PRACTICES

Everyone deserves to work in an environment where they are treated with dignity and respect. LST values an inclusive workforce because it promotes diversity of thinking and reaching solutions that help us achieve and meet the needs of our customers. Suppliers are expected to conduct themselves in a manner appropriate to the workplace, to keep all work environments free of harassment or discrimination, and to conduct relationships with appropriate behavior and integrity.

Workplace standards apply while working on LST premises, Government facilities, offsite work locations where business is being conducted, conferences, vendor fairs, and company-sponsored business and social events. Suppliers must always act in a professional manner, including maintaining the following behavior:

- Always treat others with respect.



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- Refrain from behavior that could compromise the integrity of LST.
 - Strictly comply with LST's Drug-Free Workplace Policy
 - Never make disrespectful remarks about current or former customers, vendors, subcontractors, teammates, other employees, or about LST in general.

Supplier will ensure its employees are afforded an employment environment free from physical, psychological, and verbal harassment, or other inappropriate sexual or abusive conduct. Supplier will provide equal employment opportunity to all employees and candidates for employment without regard to any legally protected characteristic. Supplier will also maintain a workplace free from illegal use, possession, sale, or distribution of controlled substances.

4.0 CONFLICT OF INTEREST

Supplier must avoid or adequately mitigate all actual, apparent, and perceived conflicts of interest in its dealings with LST. We expect Supplier to notify LST in the event of any circumstances or interests that give rise to that any such conflict, whether organizational or personal in nature, including interests of employees or their close relatives, friends, or associates.

Even if circumstances or relationships don't create an improper action, the appearance or perception of a conflict of interest can be equally damaging. Conflicts of interest are a complex subject and can be handled in many ways; sometimes disclosure to the Government is all that is necessary, but in other circumstances more actions may be required. The following guidelines outline relationships and activities that represent organizational and personal conflicts of interest.

4.1 ORGANIZATIONAL CONFLICTS OF INTEREST (OCI)

Regulations exist to ensure that (1) Government contractors do not gain an unfair competitive advantage over competitors; and (2) other interests or work performed by a contractor do not cloud the contractor's objectivity in providing impartial advice to the Government. There are three general types of OCIs:

- **Impaired Objectivity:** arises in cases when a firm's work under one Government contract could entail evaluating or assessing itself or another company with which it has a financial interest/business relationship.
- **Biased Ground Rules:** arises in situations when a firm, as part of its performance of a Government contract, sets the ground rules for another Government procurement (e.g., by preparing the statement of work, specification, or evaluation criteria) where the same firm may be a competitor.
- **Unequal Access to Information:** arises in situations when a firm has access to non-public information as part of its performance of a Government contract and where that information may provide the firm a competitive advantage in a later competition for a Government contract.

4.2 PERSONAL CONFLICTS OF INTEREST

Personal conflicts involve any relationship or activity which could or would influence, or appear to influence, performance of an individual's duties.

- **Financial Interests:** A conflict may exist if an individual, their spouse, or dependent children have a financial interest in an organization that is associated with the work being performed.
 - *Example:* Prior to working at Company ABC, Mr. Smith was employed by Company XYZ. Mr. Smith currently has financial holdings (e.g., stocks) in Company XYZ. Company ABC is working under a Government contract that requires Mr. Smith's support providing oversight of work performed by Company XYZ. Mr. Smith must disclose his financial holdings in Company XYZ as a potential conflict of interest.
- **Disclosure of Certain Relationships:** Contractors are obligated to disclose to the Government information regarding former Federal employees as well as employees who are related to a current FAA employee.
 - These relationships include: father, mother, son, daughter, brother, sister, uncle, aunt, first cousin, nephew, niece, husband, wife, father-in-law, mother-in-law, son-in-law, daughter-in-law, brother-in-law, sister-in-law, stepfather, stepmother, stepson, stepdaughter, stepbrother, stepsister, half-brother, half-sister, spouse of an in-law, or a member of his/her household.
- **Other Personal Relationships:** Employees may find themselves in a situation where their spouse, children, parents, or someone else that they have a close relationship with is a supplier/subcontractor/vendor, customer, or competitor of their current employer.
 - Such situations are not necessarily prohibited, but they call for extra sensitivity to security, confidentiality, and conflicts of interest.

5.0 BUSINESS COURTESIES

The exchange of business courtesies may not be used to advance any improper purpose or obtain an unfair competitive advantage. Supplier must ensure that the solicitation, 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.

6.0 FINANCIAL INTEGRITY

Suppliers must ensure the accuracy of their business and financial records. As a contractor to the Federal Government, Suppliers must understand the importance of financial disclosure and accountability and comply with all financial reporting and accounting regulations. Suppliers should:

- Be cost-conscious when acquiring materials and services.
- Make certain that bills are accurate, prompt, and complete.
- Whenever responsible for incurring an expense on behalf of LST or the Government, be sure it is supported by appropriate documentation that describes its purpose.



- Never make or approve a payment on LST's or the Government's behalf with the intention, understanding or awareness that any part of the payment will be used for a purpose other than the one described by supporting documents.
- Take responsibility for the accuracy of all cost charges and records. This includes proper timekeeping.
- Ensure that all statements, communications, and representations to customers are truthful and accurate.
- Never use LST or Government funds or assets for any unlawful or improper purpose, including personal use.

7.0 USE OF ASSETS AND INFORMATION SYSTEMS

It is imperative that LST and Government assets are protected and used only in the manner they were intended. Assets include facilities, computers, inventory, trade secrets and other intellectual property, office supplies, equipment, products, confidential information, and funds. Suppliers are responsible for using good judgment and common sense to ensure that these assets are not misused, misappropriated, or wasted.

Theft, carelessness, and waste have a direct impact on our credibility and ability to serve our customers. In addition, any misuse or misappropriation such as unauthorized removal of a product, equipment or information, embezzlement, or intentional misreporting of time or expense may be considered criminal and can have serious consequences.

Information systems—the hardware, software, and data that are stored, processed, transmitted, and reported—are critical to business success. Examples include computers, telephones, file servers and network, e-mail messages, and desktop applications used in the conduct of business. Suppliers must use these systems responsibly and for legitimate business purposes. Suppliers are expected to protect the security and confidentiality of LST and Government information systems.

8.0 INFORMATION PROTECTION AND GOVERNANCE

8.1 PERSONALLY IDENTIFIABLE, CONFIDENTIAL, AND PROPRIETARY INFORMATION

Supplier will properly handle, store, and secure sensitive information such as confidential or proprietary information or personally identifiable information. Supplier shall comply with applicable data privacy laws. Such information should not be used for any other purpose than the specific business purpose for which it was provided.

8.2 ACCESS

Supplier is expected to utilize appropriate physical and electronic security measures to protect such information against unauthorized access, use, destruction, modification, or disclosure and ensure compliance with DFARS clause 252.204-7012 – “Safeguarding Covered Defense Information” and other similar civilian agency information safeguarding regulations where applicable.

8.3 CLEARANCE REQUIREMENTS

Supplier must abide by all applicable facility and personnel clearance and suitability requirements related to the safeguarding of classified data and Controlled Unclassified



Information. Supplier should immediately report classified complaints through the appropriate channels (please refer to the following website for further information and instruction: <https://www.dodig.mil/Components/Administrative-Investigations/DoD-Hotline/Classified-Complaint/>)

8.4 RECORDS

Supplier will create and maintain complete and accurate records and should not alter any records to conceal or misrepresent the underlying transaction to which the record pertains. Supplier should retain records based on its applicable retention requirements, provided that if Supplier is ultimately performing for LST under a US Government contract, Supplier must comply with the applicable retention requirements in Federal regulations and requirements of the customer federal agency and any relevant National Archives and Records Administration requirements applicable to that agency.

8.5 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.

8.6 PROCUREMENT INTEGRITY

Supplier must comply with all aspects of the Procurement Integrity Act.

9.0 QUALITY

Suppliers must ensure their work product meets LST's quality standards. We expect Supplier 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 contract requirements.

Supplier will develop, implement, and maintain policies, procedures, and methods to detect and avoid counterfeit electronic parts. Supplier will promptly notify LST and 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 LST.

10.0 ENVIRONMENTAL AND OCCUPATIONAL HEALTH AND SAFETY

Supplier must comply with all applicable environmental, health, and safety laws, regulations, and directives to protect the health, safety, and welfare of its employees, visitors, and others impacted by Supplier activities. Supplier personnel should speak up if they see or hear anything that could: 1) pose a threat to anyone's safety or security, 2) damage company or customer assets, or 3) create unsafe working conditions.

During the course of business, LST encourages Supplier to improve resource efficiency, limit emissions increase sustainability, and follow waste mitigation strategies.

11.0 ANTI-CORRUPTION

Supplier shall comply with the anti-corruption laws, directives, and regulations that govern operations in the countries in which they do business, including the US Foreign Corrupt



Practices Act and the UK Bribery Act. Supplier is required to refrain from offering, making, 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.

12.0 ANTI-TRUST

Supplier must not participate in price fixing, bid rigging, division of markets, or cartel activity, nor exchange current, recent, or projected pricing information or other sensitive or non-public information with competitors. Similarly, Supplier must not share with LST the Protected Information of its competitors except as authorized by the owner of the information.

13.0 TRADE COMPLIANCE

13.1 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, including the requirement to register with the U.S. State Department's Directorate of Defense Trade Controls if Supplier is either a manufacturer or an exporter of defense articles.

13.2 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.

13.3 CONFLICT MINERALS

Supplier will have appropriate due diligence processes in place to allow LST 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.

13.4 PROHIBITED TECHNOLOGY

Supplier must not provide to LST, either directly or embedded in other products, any "covered telecommunications equipment or services" as defined in FAR 52.204-25 and AMS 3.6.4-23. Supplier must notify LST in the event it becomes aware that it has provided covered telecommunications equipment or services to LST and cooperate with LST to address the matter.

14.0 AUDIT AND ENFORCEMENT

We expect Supplier to implement and maintain measures to audit its compliance with these standards and to take appropriate corporate or personnel action to correct identified deficiencies. We expect Supplier to maintain documentation necessary to demonstrate compliance with applicable laws and regulations, and to provide LST with reasonable access



to business records to enable evaluation of compliance with applicable laws and regulations with respect to LST work.

15.0 CONSEQUENCES FOR VIOLATING CODE

LST 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, LST may be required to report such violations to the proper authorities. We reserve the right to terminate our relationship with any supplier under the terms of the existing subcontract or purchase order.

16.0 REPORTING

Suppliers should offer whistleblower protections and provide their employees with avenues for raising legal or ethical issues or concerns without fear of retaliation.

Suppliers should promptly report all issues or violations through the proper channels. We encourage notifying Ethics@lstechllc.com or 703-621-0705 to help resolve matters. Anonymous reports may also be submitted using the following form, which is not hosted on LST's website or servers:

<https://app.smartsheet.com/b/form/0303390421e545f2a46a8fd50648ecd9>