

## PAE THIRD PARTY CODE OF CONDUCT

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### Dear Valued Third Party,

Since 1955, PAE has distinguished itself from its competitors by maintaining a reputation of integrity and excellence while providing critical services to our customers. We are fully committed to dealing honestly and fairly with our employees, partners, customers, suppliers, shareholders and the communities in which we live and work. At PAE, we apply the highest standards of ethics and compliance to our business conduct, and we seek out partners and suppliers who maintain the same high standards. PAE recognizes the critical role our partners and suppliers play in maintaining PAE's reputation and ability to do business worldwide. Accordingly, we expect third parties with whom we do business, including our partners, suppliers, subcontractors, consultants and joint ventures ("**Third Parties**"), to adhere to the ethics and compliance standards set forth in this document.

### Complying with Laws

- Third Parties shall comply with the laws of relevant countries, including without limitation laws concerning public procurements.

### Counteracting Corruption and Bid Rigging

- Third Parties shall refrain from bribing government officials and violating the U.S. Foreign Corrupt Practices Act and applicable anti-bribery laws of other countries.
- Third Parties shall actively and consistently counteract any criminal or unethical influence on decisions taken by PAE, or other companies and institutions, and fight corruption within their own companies.
- Third Parties must not engage in any act that would bring into question PAE's reputation.
- Third Parties must act with integrity in all dealings, whether directly involved with PAE or not.
- Third Parties shall not participate in anti-competitive bid rigging.

### Counteracting Illegal Employment and Respecting the Fundamental Rights of Employees

- Third Parties shall comply with applicable legal requirements for employment.
- Third Parties shall respect the health, safety and personal rights of their employees and adhere to the principles of respect, fairness and non-discrimination. They shall employ and remunerate their employees on the basis of fair and compliant contracts and avoid the act or the appearance of engaging in human trafficking.
- Third Parties who are hire people to work with PAE must ensure that results from candidate pre-employment or pre-engagement screening processes meet PAE standards before an assignment is confirmed.

### False Claims:

- Third Parties shall not make any false statements in support of a claim for payment, where the statement was "material" to the government's decision to pay that claim.

### Respecting the Environment

- Third Parties shall observe applicable environmental standards.

### Protecting Technology Transfers

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- Third Parties shall observe applicable restrictions on technology transfer, including the export control laws and regulations of the U.S. and other relevant jurisdictions.

### **Reporting Violations of the Code**

- Third Parties are required to report their own violations of this Code of Conduct, insofar as these violations affect their business relations with PAE. They are also asked to report to PAE any knowledge of misconduct on the part of PAE employees.
- Third Parties are required to resolve any suspicious cases and to cooperate fully with PAE in this regard. If there are reasonable grounds to believe that a Third Party has violated this Code of Conduct or if a Third Party fails to sufficiently meet its obligations to resolve a case or to cooperate with PAE, PAE may end all business relations with the Third Party with immediate effect. In the event of a violation of this Code of Conduct, PAE retains the right to initiate further legal measures.

### **Contact PAE**

- Karina Vollmer, Chief Ethics & Compliance Officer; tel.: +1 703-717-6170; karina.vollmer@pae.com
- Whit Cobb, Sr. Vice President & General Counsel; tel. +1 703-717-6016; whit.cobb@pae.com
- Compliance Hotline, +1 703-656-7500 or 888-360-4697. Information received over the hotline remains completely anonymous because with these special telephone numbers the caller cannot be identified.

PAE requests from Third Parties that they require their own associated entities to also comply with the principles of this Code of Conduct. Additionally, PAE may update the Code of Conduct from time to time.

### **Declaration of Adherence to the PAE Third Party Code of Conduct**

\_\_\_\_\_ has received the PAE Third Party Code of Conduct and, in addition to its other contractual obligations to PAE, hereby agree to abide by it.

**Third Party:** \_\_\_\_\_

**By (signature):** \_\_\_\_\_

**Name (printed):** \_\_\_\_\_

**Title:** \_\_\_\_\_

**Date:** \_\_\_\_\_