



# SUPPLIER CODE OF CONDUCT

Modern Technology Solutions, Inc. (MTSI) is a fast-paced and dynamic 100% employee-owned and operated technology firm, providing leading-edge technical services. Our mission is to make important and lasting contributions to our nation's defense and security by providing leadership and best-value solutions to American's most technically challenging strategic matters. MTSI's Core Values form the foundation of who we are. Among these Core Values are:

- Leadership, Quality, Responsiveness in Service Delivery
- Own & Solve Customer's Problems
- Ethics, Integrity & Trust
- Organizational Teamwork & Collaboration
- Open, Honest, & Respectful Communication

This Supplier Code of Conduct outlines the expectations MTSI holds for all of our suppliers. These ensure all of us conduct ourselves with the highest degree of integrity and honesty in all of our business dealings. How we all behave is just as important as the problems we solve. Commensurate with the size and nature of their business, MTSI expects all of our suppliers to have management systems in place to support compliance with the letter, spirit and intent of applicable laws, regulations, and the expectations related to or addressed expressly with this Supplier Code of Conduct. MTSI encourages its suppliers to implement their own written code of conduct and to flow down the principles of a code of conduct to the entities that furnish them with goods and services.

## **Laws, Regulations and Contracts**

MTSI expects its suppliers to be in full compliance with all laws and regulations applicable to their business, including all export and import control laws and regulations. Additionally, MTSI expects its suppliers to comply with the terms and conditions of their respective contractual agreements with MTSI.

## **Integrity**

MTSI will not tolerate corruption and expressly prohibits anyone conducting business on MTSI's behalf, including suppliers, from offering or making any improper payments of money or anything of value to government officials, political parties, candidates for public office, or other persons. MTSI suppliers must comply with the anti-corruption laws, such as the U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act, that govern operations in the countries in which they do business.

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.

Suppliers must comply with all aspects of the Procurement Integrity Act, which generally prohibits:

- Knowingly obtaining bid, proposal, or source-selection information related to a current or future federal procurement,
- Disclosing bid, proposal, or source-selection information to which supplier has received access in the course of providing support or advice to a federal agency, or engaging in employment discussions with, employing, or providing compensation to certain former government procurement or contract officials.

### **Fair Competition/Anti-Trust**

MTSI expects suppliers to conduct business in accordance with all applicable anti-trust or anti-competition laws and regulations. This includes avoiding business practices such as entry into arrangements that unlawfully restrain competition, improper exchange of competitive information, price fixing, bid rigging, or improper market allocation.

### **Conflict of Interest**

We expect our suppliers to avoid all conflicts of interest or situations giving the appearance of a potential conflict of interest in their dealings with MTSI. We expect our suppliers to provide notification to all affected parties in the event of an actual or potential conflict of interest arises. This includes conflict between interests of MTSI and personal interests or those of close relatives, friends or associates.

### **Financial Responsibility/**

#### **Accurate Records**

MTSI expects its suppliers to accurately record, maintain, and report business documentation, including but not limited to, financial accounts, quality reports, time records, expense reports, resumes and submissions to MTSI, the customer or regulatory authorities.

### **Information Protection**

We expect our suppliers to take proper care to protect all sensitive information, including confidential, proprietary, and personal information. Information should not be used for any purpose (e.g. advertising, publicity, and the like) other than the business purpose for which it was provided, unless there is prior authorization from the owner of the information.

MTSI expects its suppliers to respect and comply with all the laws governing intellectual property rights assertions, including protection against disclosure, patents, copyrights, and trademarks.

### **Employee Safety and Health**

MTSI expects its suppliers to comply with applicable safety and health laws, regulations, policies, and procedures. Suppliers should provide for the health, safety, and welfare of their people, visitors, and others who may be affected by their activities.

### **Non-Discrimination**

MTSI expects its suppliers to provide equal employment opportunity to its 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 function of the job can be performed with or without reasonable accommodation.

### **Harassment**

MTSI expects its suppliers to ensure that employees who may perform their work in an environment free from physical, psychological and verbal harassment or other abusive conduct.

### **Export/Import Control**

MTSI expects its suppliers to ensure that their business practices are in accordance with all applicable laws and regulations governing the export and import of domestic and foreign origin parts and components, dual-use items and related technical data. The deliverables or services, or part of them may be subject to national, foreign or international trade and export control laws and regulations, to include the Arms Export Control Act, the International Traffic in Arms Regulations, the Export Administration Regulations, the asset control and sanctions programs administered by the Treasury Department's Office of Foreign Assets Control, the Wassenaar Arrangement and other multinational controls.

### **Trade Agreements**

MTSI expects its suppliers to ensure their business practices are in accordance with all applicable laws and regulations governing the acquisition of U.S. made or designated country end products under the Trade Agreements Act or applicable Free Trade Agreements, especially as it relates to GSA contracts.

### **Counterfeit Parts**

Suppliers must take due care to ensure their work product meets the quality standards required of their specific Agreements. MTSI

expects its suppliers to have in place quality assurance processes to identify defects and implement corrective actions, and to facilitate delivery of a product whose quality meets or exceeds the contract requirements. Suppliers must maintain methods and processes appropriate to their products and services to minimize the risk of introducing counterfeit parts and materials into deliverable products. 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 the delivered product.

### **Drug Free Workplace**

MTSI expects its suppliers to maintain a workplace free from illegal drugs.

### **Human Rights**

MTSI expects its suppliers to treat people with respect and dignity, encourage diversity and diverse opinions, promote equal opportunity for all, and help create an inclusive and ethical culture.

### **Human Trafficking**

MTSI expects its suppliers to not engage in the use of forced, bonded (including debt bondage) or indentured labor, involuntary prison labor, slavery, or trafficking of persons. This includes transporting, harboring, recruiting, transferring, or receiving vulnerable persons by means of threat, force, coercion, abduction, or fraud for the purpose of exploitation.

### **Reporting**

Employees of MTSI suppliers should have access to an adequate avenue of raising issues or concerns without fear of retaliation.

For questions regarding the MTSI Supplier Code of Conduct:

E-mail: [Compliance@mtsi-va.com](mailto:Compliance@mtsi-va.com)

Write: Compliance Officer  
MTSI

5285 Shawnee Road, Suite 400  
Alexandria, VA 22312

This Supplier Code of Conduct is not intended to conflict with or modify the terms and conditions of any existing contractual agreement. In the event of a conflict, suppliers must first adhere to the applicable laws and regulations, then the contract terms, followed by this Supplier Code of Conduct.

If you believe that MTSI or its employees or agents have acted improperly or unethically, you may report it to [Compliance@mtsi-va.com](mailto:Compliance@mtsi-va.com) or report it on our third party hotline - EthicsPoint (844) 587-1661.