

The Standard

2018



We strengthen our nation and improve the lives of its citizens by solving the most demanding national security and information-related challenges through unparalleled expertise, innovation, and commitment.



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Message from the CEO

Mac Curtis

President and Chief Executive Officer

June 2018

Colleagues:

It's a pleasure to introduce you to Perspecta's code of conduct, The Standard. The Standard plays a critical role in the implementation of our mission and most prominently our values by outlining concrete behaviors that are expected from us all.

Following the core values defined here demonstrates that we are all striving to be the best in everything we do and helps bring these corporate statements to life. These statements are more than merely words on a page – they are a call to action that guides everything we do.

As our values make clear, each of us is expected to be a steward of the highest ethical standards. Yet demonstration of ethical behavior on an organizational scale is neither accidental nor unintentional. Ethical behavior is a deliberate and purposeful selflessness that respects others while building strong interpersonal relationships.

If we each internalize the guidelines presented on the following pages, we will build a strong sense of culture that will define who we are as a company and help further distance Perspecta from our competitors.

A handwritten signature in black ink that reads "Mac Curtis". The signature is written in a cursive, flowing style.

Mac Curtis
President and Chief Executive Officer
Perspecta Inc.



Respect:

We treat each other with respect

Accountability:

We are accountable for our actions

Integrity:

We demonstrate integrity in everything we do

Success:

We bring our customers success through mission focus, commitment and innovation

Empowerment:

We are empowered to drive results





“Ethics knows the difference between what you have a right to do and what is right to do.”

Former U.S. Supreme Court Justice Potter Stewart





Message from the Chief Ethics and Compliance Officer

Sarah Lynn

Perspecta | Chief Ethics and Compliance Officer

At Perspecta, our core values drive our behavior every day whether it be delivering exemplary services to our customers or acting with respect and integrity when interacting with our peers and partners. As a government contractor, compliant and ethical behavior is in our DNA. In helping to achieve our customers' missions, we want to be known as a company that does the right thing and makes the right decisions. This means understanding our compliance policies and procedures and raising concerns when necessary.

Ethics issues and concerns can be reported in a variety of ways, including anonymously through our ethics helpline. All concerns raised will be treated confidentially and we will never retaliate against any employee who speaks up honestly and in good faith. We expect our employees to behave with integrity, and will hold them accountable if we find misconduct.

Our code of conduct, The Standard, as well as supporting policies, guidance documents and related training, provide the framework for employees to meet Perspecta's expectations in performing work for the company. If you find yourself in a situation where you do not know what to do, reach out for guidance. Your leadership, the office of general counsel, human resources, security and the ethics and compliance team are available to provide answers.

As Perspecta employees, we are all responsible for understanding and complying with The Standard, applicable laws, government regulations and Perspecta policies related to our jobs. In fulfilling these responsibilities, each of us must:

- **Read, understand, and comply with The Standard and Perspecta policies related to our job**
- **Participate in training and educational programs/events required for our job**
- **Obtain guidance for resolving a business practice or compliance concern if we are uncertain about how to proceed in a certain situation**
- **Report possible violations of The Standard, policies, applicable laws and regulatory requirements through our established channels**
- **Cooperate fully in any investigation**
- **Make a commitment to conduct Perspecta business with integrity and in compliance with applicable laws and regulatory requirements**

A handwritten signature in black ink, appearing to read 'Sarah Lynn'.

Sarah Lynn



The standard for your conduct



All concerns raised will be treated confidentially and we will never retaliate against any employee who speaks up honestly and in good faith.

Your responsibility for upholding the code of conduct

Our code of conduct provides the ethical guidelines and expectations for conducting business on behalf of Perspecta. All employees and members of the Perspecta Board of Directors, as well as consultants or others representing Perspecta, are expected to act in ways consistent with The Standard.

You are required to read the code of conduct, raise questions if you have any concerns or if you need clarification, and conduct business in accordance with the code of conduct.

The ethics and compliance office (ECO) serves as an independent resource for information, advice and resolution of problems and issues.

Violations of The Standard or other Perspecta policies may result in disciplinary action, up to and including termination of employment.

Headline test

The headline test is a simple way to check if your decision is ethical and meets Perspecta's expectations:

- **Is it legal?**
- **Is it consistent with The Standard and Perspecta policies?**
- **Would others think it was ok if they read it in a news story?**

If your answer is no to any of these questions, do not do it. If you are unsure, seek guidance.

When in doubt: Ask before you act!

“See something, say something”

At Perspecta, we all have the responsibility to promptly report if we believe that a violation of the code of conduct has occurred or if we are asked to violate the code.

You are encouraged to raise issues to your manager. If you are uncomfortable with the answer, seek guidance from:

- **Another manager**
- **ECO or the office of general counsel**
- **Human resources**
- **Security**
- **A phone call to the ethics helpline or email to ethics@perspecta.com**

Speaking up to report questionable conduct protects the ethical work culture we value as employees and it protects our company. It is never acceptable to violate the code of conduct for an employee's personal benefit or for the benefit of the company.

Concerns may be raised anonymously through the ethics helpline or EthicsPoint website.

Our actions matter

Part of being a leader at Perspecta means promoting an inclusive, positive, ethical work environment where all employees are valued for their contributions. Leaders of Perspecta are responsible to encourage employees to speak up and raise issues or concerns. Modeling ethical behavior or “walking the walk” is crucial to maintain the ethical culture we value as an organization.

We do not retaliate and do not tolerate retaliation from others.

We comply with laws and regulations

As employees with integrity, we are expected to perform all of our job duties on behalf of Perspecta in compliance with the laws and regulations of the United States (including states and municipalities) and company policies. Perspecta legal and the ECO are always available to help you understand the laws and regulations that apply to your job. It should be understood, however, that upholding our Values and this code may require more than mere compliance with laws and regulations.

Our CEO and senior financial officers have a special duty to ensure that our financial statements and public filings accurately represent our financial position. We must:

- **Promote complete, timely and honest disclosure in all of our public regulatory filings**
- **Never ignore or overlook financial misconduct or other irregularities**
- **Always cooperate with auditors and investigators**
- **Promptly disclose any potential conflict of interest**
- **Honor, safeguard and promote compliance with our internal control systems**
- **Ensure our books and records are maintained in accordance with applicable accounting policies, laws, rules and regulations**
- **Respect and promote the need to report suspected accounting, internal control or audit violations to appropriate government agencies, such as the U.S. Securities and Exchange Commission**

Waiver requests or substantive changes to our code must be approved by the Perspecta Board of Directors or Perspecta Audit Committee, and disclosed promptly as required by law.

We maintain accurate business records

You must ensure the accuracy of all business or financial records for which you are responsible, and maintain records in accordance with your department's policy.

If you have concerns about any aspect of our business, financial records or auditing matters you should talk to your manager, finance, internal audit, legal or the ECO.

We accurately record and charge labor and other costs

You and your manager are responsible for understanding and complying with the labor recording policies and procedures specific to your work. You are also responsible for properly accounting for labor, travel,

material and other costs, as well as ensuring that they are accurately recorded and charged to appropriate cost objectives, and if necessary, company corporate credit cards. These costs include, but are not limited to, normal contract work, indirect work, work related to independent research and development, and bid and proposal activities.

Knowingly mischarging the time that you work or falsifying your time keeping violates company policy and the law.

No employee shall knowingly charge an incorrect account or cost objective, or knowingly approve such mischarging. Shifting costs to improper accounts is also prohibited.

Transactions between Perspecta and outside individuals and organizations must be promptly and accurately recorded. Under no circumstances may you misrepresent facts or falsify records.

Perspecta does not tolerate mischarging of time or expenses, even if inadvertent. Employees who mischarge their time or expenses violate Perspecta's code of conduct and are subject to disciplinary action. Perspecta will comply with customer reporting obligations related to mischarging of time or expenses. Additionally, the employee's manager will be held accountable for approving mischarged time and may be subject to disciplinary action.

Disciplinary action will be taken against any employee, supervisor or manager who retaliates against an employee who reports a mischarging violation, or who may be responsible for a violation due to inadequate supervision.

On the basis of adequate evidence, and considering the seriousness of the acts or omissions, disciplinary action may range from a written reprimand placed in the employee's file to termination of employment. Civil and/or criminal prosecution by the U.S. government is also possible.

We do not trade on or disclose nonpublic material information

Trading based on inside information is unethical and illegal. We take our obligation to prevent insider trading seriously.

In your work, you may have access to information about our company or a third party that's not available to the public. If this nonpublic information is material, and therefore likely considered important to an investor in a decision to buy, sell or hold stock or other securities, then it could be considered "inside information." Trading based on inside information is illegal. "Tipping," or passing along

information to others is also illegal.

Inside information can include material non-public information about:

- **Mergers and acquisitions**
- **Changes in leadership**
- **Financial projections**
- **Significant business deals**

Never trade inside information or share it with others until after it's been released to the public. Be careful to avoid even the appearance of an improper transaction.

If you're ever unsure whether information has been released to the public or if you can share it, seek guidance from legal or the ECO before taking action.

We compete vigorously and fairly

Perspecta will not use a substantial market position to establish restrictive practices that diminish competition without valid business justification or consumer benefits. We do not agree with competitors or partners to any type of bid rigging or improper collusion; this includes but is not limited to, setting prices, limiting production, or dividing up customers, suppliers or markets.

You must avoid engaging in or discussing any of the above activities with competitors, suppliers or customers, and must report any instances in which such activities are proposed or discussed to legal.

We respond truthfully and accurately to audits, investigations and legal actions

You are required to cooperate with all internal investigations and audits. You must never destroy or alter any documents or electronic records; lie to or mislead an investigator; or obstruct the collection of information relating to an investigation, litigation or audit.

Occasionally, as part of an investigation, legal, the ECO, human resources, or security may conduct an inspection or surveillance of Perspecta property. The reasons for such investigations include protecting Perspecta, its employees and customers against fraud and espionage, preventing the abuse of Perspecta property and other business purposes. Employee records, documents, telecommunications, voicemail, email, internet and computer systems, as well as Perspecta premises, mail, offices, furniture, equipment, employee offices, desks, file cabinets, computer files, telephone toll records and

lockers, are all subject to inspection. Additionally, all packages and employee automobiles, while on Perspecta premises, are also subject to inspection without prior notice.

To the greatest extent possible, Perspecta cooperates with government agencies responsible for investigating suspected violations of the law. You may also be required to cooperate with investigations conducted by the government. You must notify the ECO or the legal department immediately if you learn that a government or third party agency is conducting an investigation or asking for information pertaining to a suspected violation of the law.

We comply with laws and regulations governing political contributions and lobbying

Many countries, including the United States, prohibit Perspecta from donating corporate funds, goods or services—including employee work time—directly or indirectly, to political candidates. Local and state laws also govern Perspecta's political contributions and activities. Because the laws in this area are complex, you must obtain written approval of legal before using any company funds, assets or facilities for the benefit of political parties or candidates anywhere in the world.

You are encouraged to participate personally in civic affairs and the political process and to support the political parties and candidates of your choice. Your involvement and participation in the political process must be on an individual basis, on your own time, at your own expense and not as a representative of Perspecta. If you are directly solicited to contribute to a political campaign or attend an event on behalf of Perspecta, you must contact legal prior to the event.

If you campaign for or hold public office, or serve on commissions or advisory groups, you must be aware of and avoid conflicts of interest that may arise related to your employment with Perspecta. If you plan to seek or accept a public office, you must consult with legal in advance to resolve any potential conflicts of interest.

You must also be certain to know and follow company guidance before contacting U.S. congressional and executive branch employees and staff. If you engage in such activity, you may be engaged in lobbying. You must coordinate with legislative affairs before interacting with U.S. congressional and executive branch employees and staff.

Perspecta has established a Political Action Committee in which you may elect to participate, but your participation is entirely voluntary.

We do business ethically outside the United States

Perspecta's commitment to the highest standards of ethical conduct applies globally. Unless prohibited by U.S. law, you are responsible for complying with the national and local laws of the countries in which we operate. In the case of a conflict with U.S. law, you must obtain direction from legal or the ECO on how to resolve the conflict.

Anti-corruption

You must strictly comply with the anti-corruption laws that govern our operations in the countries in which we do business. Such laws include the U.S. Foreign Corrupt Practices Act (FCPA) and similar laws enacted by other countries. Generally, these laws prohibit bribery, directly or indirectly, of foreign government officials, political parties or candidates to obtain some improper business advantage. More specifically, they prohibit you, directly or indirectly, from corruptly giving, offering, or promising anything of value to foreign officials or foreign political parties, officials or candidates, for the purpose of influencing them to misuse their official capacity to obtain, keep or direct business or to gain any improper advantage. In addition, to prevent concealment of bribery, the FCPA prohibits knowingly falsifying a company's books and records, or knowingly circumventing or failing to implement adequate internal accounting controls.

Export/import and other trade restrictions

You are required to strictly comply with all export and import laws and regulations that govern the transfer between countries of certain technical data, equipment and technology. The export licensing and controls that govern such transfers, as well as the rules pertaining to the import of goods and services, are complex. You must be careful to avoid even inadvertent violations.

In addition, you may not obligate Perspecta to engage in trade in any country subject to trade restrictions imposed by the U.S. government. Such restrictions can include sanctions or embargoes that prohibit Perspecta from engaging in certain business activities in specified countries, and with specified individuals and entities. To ensure compliance, you are responsible for consulting with company experts in the International Trade Controls and Compliance Office (ITCO) before negotiating any foreign transaction.

Anti-boycott

You may not enter into an agreement, provide any information, or take any action that would cause Perspecta to deal with potential or actual customers, suppliers or others in support of an illegal boycott,

or otherwise engage in or support restrictive international trade practices or boycotts not sanctioned by the U.S. government. All requests to engage in any such activity must be immediately reported to legal or the ECO.

We have zero tolerance for discrimination and harassment

Perspecta values inclusion and diversity in the workplace. At Perspecta, understanding and respecting each individual brings out the best in all employees so we can achieve great things together.

Diversity and teamwork

Perspecta's success is predicated on our ability to attract and retain the highest-quality people with a range of viewpoints to help solve our customers' most pressing problems. To do that, each of us must be dedicated to maintaining and reinforcing an open and supportive work environment that fosters professional development and achievement.

Perspecta is a premier partner of choice for providing high-impact analytical and technical expertise to solve our customers' complex problems. We foster a workforce culture that recognizes diversity as a business imperative and leverages inclusion to drive performance, promote business growth, and enhance mission success and customer satisfaction.

Perspecta attracts, develops and retains talent from diverse backgrounds, and ensures that employees and candidates for employment are afforded equal opportunity in all employment actions. By creating a culture committed to our core values, we leverage the unique make-up of our professionals to solve complex issues. Every Perspecta employee must foster an inclusive workplace in which all individuals can contribute their best work.

We provide a harassment-free work environment

Perspecta is committed to providing a respectful work environment that is free from threats, violence, harassment and discrimination. You are expected to maintain a professional work environment and treat all Perspecta employees, suppliers and customers with dignity and respect.

No employee shall engage in any conduct of a threatening, hostile, offensive, abusive, humiliating, or violent nature toward any employee, supplier, customer or any other person with whom he or she comes into contact during or as a result of his or her

employment with Perspecta. Perspecta does not tolerate inappropriate actions, comments, physical contact, bullying, sexual advances or any other conduct that is intimidating or otherwise offensive or hostile.

Harassment or discrimination of any kind – especially involving race, color, pregnancy status, religion, age, disability, national origin, sexual orientation, veteran status, ethnicity, genetic information, ancestry, gender, gender identity or expression, marital status, family structure, or beliefs – will not be tolerated.

If you have any knowledge of violence or the threat of violence, intimidation, harassment, or discrimination, it is your responsibility to report it to your manager, security, human resources, legal, or the ECO immediately.

Discrimination or harassment in the workplace by any employee is taken extremely seriously and can result in disciplinary action up to and including dismissal as well as personal legal and financial liability.

We provide and accept appropriate amenities

Perspecta defines the term business amenity broadly to mean a gift, gratuity, favor, benefit, loan, commission, discount, forbearance or other intangible or tangible item having monetary value for which fair market value is not paid by the recipient. Such courtesies include, but are not limited to cash, honoraria, entertainment and recreation (tickets to sporting, recreational or other events, passes, fees, etc.), services, training, transportation, discounts, promotional items, lodging, meals, drinks, door prizes or use of a donor's time, material, equipment or facilities.

Perspecta does not consider the following items to be "amenities":

- **Modest refreshments, such as water, tea, coffee, and snacks (other than meals)**
- **Greeting cards, plaques, certificates, etc. intended for presentation**
- **Benefits (e.g. discounts) that are also available to the public or to all government employees**
- **Anything for which the recipient pays fair market value**

We do not offer or provide business amenities to government customers

The rules and regulations that apply to the offering of business courtesies to government employees, officials and representatives of the U.S. federal, state and local or foreign governments are complex. In

this marketplace, even the appearance of impropriety can be the basis for protests, governmental inquiries, or the loss of Perspecta's ability to conduct government business. It is the Perspecta policy that ***Perspecta employees may not offer, give or promise to give, directly or indirectly, any government employee anything of value – including gifts, meals, entertainment or travel – unless the recipient pays its fair market value.*** Other government contractors often have similar restrictions concerning the acceptance of business amenities by their personnel which should be respected in our dealings with them.

Limited exceptions may apply only when approved, in advance, by the ECO and your manager. Only very limited exceptions will be considered for approval, such as openly announced marketing activities, appropriate no-charge service offerings, select promotional activities and public policy initiatives.

In all cases, even if one of the limited exceptions applies, Perspecta employees may not offer, give, solicit or receive any amenity or other thing of value in exchange for favorable treatment or advantage, or for the purpose of obtaining, or attempting to influence the award of a contract or subcontract.

Personal gifts to friends and family

Personal gifts to friends or family who happen to work for a government entity are not prohibited as long as:

- **The gift is given under circumstances which make it clear that the gift is motivated by a family or personal relationship and that the relationship is not rooted in business activities with Perspecta**
- **Perspecta funding is not, in any way, used to pay for a personal gift provided within these guidelines**

Offering or providing business amenities to nongovernment customers and partners

You may provide business amenities of reasonable value to nongovernment customers in support of Perspecta business activities, provided:

- **The practice is not for any improper purpose and does not violate any law or regulation or, to your knowledge after reasonable inquiry, the standards of conduct of the recipient's organization**
- **The business amenity is consistent with marketplace practices, infrequent in nature and not lavish or extravagant**

You are prohibited from offering or giving tangible gifts (including tickets to sporting, recreational or other events) having a market value of \$100.00 or more to a person or entity with which Perspecta does or seeks to do business, unless specifically approved, in advance, by the ECO and your manager.

Acceptance of business amenities by Perspecta employees who procure goods or services

If you buy goods or services for Perspecta or are involved in the procurement process, you must treat all suppliers uniformly and fairly. In deciding among competing suppliers, you must objectively and impartially weigh all facts and avoid even the appearance of favoritism.

For this reason, you may not accept gifts from suppliers or vendors, except advertising or promotional items of nominal value such as a pen, key chain, water bottle, visor, cup or glass or generally similar items displaying a company's logo. Established routines and procedures should be followed in the procurement of all goods and services.

Acceptance of business amenities by Perspecta employees in nonprocurement functions

Although you may not use your position at Perspecta to obtain business amenities, it is permissible to accept unsolicited business courtesies, provided the acceptance:

- **Will promote goodwill and successful business relations**
- **Is not lavish or extravagant under the circumstances**
- **Is not frequent and does not reflect a pattern or the appearance of a pattern of frequent acceptance of amenities from the same entities or persons**
- **Has a market value of \$100.00 or less**
- **Is something you would feel comfortable discussing with your manager or a coworker, or having known by the public**

Solicitation of business amenities is always prohibited. It is your personal responsibility to ensure that your acceptance of a business amenity does not create the perception that favors were granted to secure favorable treatment.

Questions and exemptions

If you have any questions about whether an offer or acceptance of a business courtesy is in compliance with applicable laws, regulations, and Perspecta's policies, you must obtain guidance in advance from ECO. You may only offer, give or accept a business amenity that is not expressly permitted by the code of conduct or Perspecta's policies if you obtain written approval, in advance, from the ECO and your manager.

We avoid personal conflicts of interest

A personal conflict of interest exists when you have divided loyalties – when you have a direct or indirect

personal interest in a transaction or matter such that it might reasonably appear to affect the judgment that you exercise on behalf of Perspecta, influence your actions or lead you to neglect Perspecta's business interests.

As Perspecta employees, we have the responsibility to act in a fair and impartial manner in all business dealings, and to place the interests of Perspecta over personal interests in matters relating to Perspecta's business.

Government contracting employees "who perform an acquisition function closely associated with inherently governmental functions or have access to nonpublic information" need to be particularly free from any personal conflict of interest.

Personal conflict of interest guidelines

You must avoid financial, business or other transactions or situations in which your personal interests might conflict with, or appear to conflict with, the interests of Perspecta. Such situations may arise from relationships with customers, competitors, suppliers, present or prospective employees or from the acquisition or use of company assets for personal gain. An actual personal conflict of interest does not need to be present to constitute a violation of The Standard; you must also avoid activities that create the appearance of a conflict of interest.

A personal conflict of interest may exist when you use your contacts or position in the company to advance interests other than the company's, such as your own private business or financial affairs, or those of a friend or relative (whether or not at the expense of the company). You should never use company property or information for personal gain, or take for yourself personally any opportunity that is discovered through your position at Perspecta.

Examples of how a personal conflict of interest could occur:

- **Acceptance of gifts, payment or services from those seeking to do business with Perspecta**
- **Having a personal interest or potential for gain in any company transaction**
- **Placement of business with a firm owned or controlled by an employee of Perspecta or their family**
- **Ownership of, or substantial interest in, a company that is a customer, competitor or a supplier**
- **Employment by a competitor or potential competitor, regardless of the nature of the employment, while employed by Perspecta**
- **Acting independently as a consultant to a Perspecta customer or supplier, while employed by Perspecta**
- **Having a close, personal relationship with a subordinate employee**

You must disclose in writing any situation, transaction, or relationship that might give rise to an actual or potential conflict of interest to your manager, who will review the disclosure with the ECO.

We avoid organizational conflicts of interest

To ensure that Perspecta is free from or properly mitigates organizational conflict of interest (OCI) issues, all new business opportunities are screened by business development and contracts personnel. If during the screening process a potential OCI is identified, Perspecta leadership and contracts will meet to determine what course of action will be pursued.

Proactive screening and resolution of OCI issues ensures our continued participation in new business opportunities, while supporting our policy to conduct business in accordance with the highest standards of ethics and integrity.

We avoid conflicts of interest when hiring and working with former government employees

Perspecta is proud that many of its employees are former government employees or members of the armed forces, and values the expertise and skill these individuals bring to Perspecta. In recruiting current and former government employees, Perspecta is cognizant that certain laws and regulations may restrict the activities these individuals can perform after leaving government services.

Current and former government employees must undergo screening to identify any post-employment restrictions which might impede an applicant's ability to perform work for the company. In addition, current government employees applying for a position with Perspecta must affirm that they are in compliance with their ethical obligations in seeking outside employment.

You are responsible for ensuring Perspecta avoids conflicts of interest in connection with employing or acquiring the services of current or former government employees. The laws and regulations governing the hiring and employment of former government employees can be difficult to follow. When in doubt, you should consult Perspecta policies and procedures, and seek the advice of your manager, human resources, the ECO or legal.

We properly engage consultants, representatives and other third parties

You must not retain a consultant, representative or other third party to conduct business in a manner that is contrary to Perspecta's policies or procedures, or that would circumvent our values and principles. For example, you must not retain consultants, representatives or other third parties for the purpose of paying bribes or kickbacks, engaging in industrial espionage, obtaining the proprietary data of a third party without authority, or improperly gaining inside information or influence.

You are responsible for seeking advice from legal prior to engaging an international or domestic consultant. Consultants and representatives must certify their willingness to comply with The Standard, Perspecta's policies and procedures, and all applicable laws and regulations.

We guard information

We protect sensitive information

Perspecta's customers trust us with their sensitive information, and it is our obligation and requirement to protect it fully and completely. You may not disclose or receive sensitive information, including proprietary company information, without proper authorization. You must keep sensitive information, including any proprietary documents, protected and secure. You may only disclose sensitive information if you have the proper authorization to do so.

You should not include any proprietary or confidential information in any public disclosures without obtaining the proper prior approval. Public disclosures include publications, presentations, reports or documents filed with regulatory authorities, and other public communications.

In the course of normal business activities, suppliers, customers and competitors may sometimes divulge to you information that is proprietary to their business. You may only accept or use the proprietary information of a supplier, customer, or competitor in accordance with the terms of your agreement with that third party and Perspecta policy. If you receive proprietary information from a supplier, customer, or competitor without proper authorization, you must immediately bring this to the attention of legal or the ECO.

If you become aware of any unauthorized use of company or client information in violation of these guidelines, you must immediately bring this to the attention of legal or the ECO. You must also report any suspicious computer activity to the computer incident response team.

We protect personal information

In the course of performing work for Perspecta, you may be required to access the personal information of other employees or third parties. If you collect or access personal information on behalf of Perspecta, you are responsible for knowing and complying with all applicable laws and policies that govern such activities.

You must not access personal information of another Perspecta employee or a third party unless you have a “need to know” such information for legitimate business purposes and have prior authorization. If you have access to personal information, including personnel or medical records, you may not disclose such information without proper authorization.

You must keep personal information protected and secure in accordance with all corporate policies, laws, and applicable third party agreements. You must never use personal information for any purpose for which it was not intended or for personal gain.

If you become aware or believe that personal information has been accessed by an unauthorized person, disclosed inappropriately, used for purposes other than Perspecta’s business, or gathered in violation of corporate policy or the law, you must immediately bring this to the attention of legal or the ECO.

We protect company and customer assets

You are responsible for the proper use of company and customer property, electronic communication systems, information resources, materials, facilities and equipment. You must use and maintain these assets with the utmost care and respect, guarding against waste and abuse, and you must never borrow or remove them from company or customer property without management’s permission.

Company assets are intended to be used for the conduct of Perspecta’s business. You may occasionally use company assets for personal use if you obtain permission from your manager and your use is in accordance with company policy. You must also seek guidance and permission before using any customer asset for personal use. You may not use the company’s resources to support a personal business, or for an illegal act or a purpose which would cause embarrassment to Perspecta. Use of corporate credit cards for personal use is strictly prohibited.

You have no expectation of privacy with regard to use of company assets. By your acknowledgment of the System Use Monitoring Notice upon logging in to your computer, your usage may be monitored and recorded.

When electing to access corporate data remotely through the Bring Your Own Device (BYOD) program, you must

comply with the user acknowledgment agreement including the rules of behavior. Perspecta has the right to restrict or rescind computing privileges, or take other administrative or legal action due to violation of these rules.

When using social media for business or personal use, you must be aware of, understand and embrace Perspecta’s standards and values, including respecting others, behaving appropriately, using sound judgment and prohibiting the unauthorized use of the information of others.

While on Perspecta premises, you may not use electronic devices while driving unless the vehicle is parked in a safe and legal location or, for voice communications only, unless a hands-free device is used.

We stay focused on security

Our commitment to security is at the core of who we are as a company. More importantly, sound security practices protect our nation’s future and the lives of personnel serving in harm’s way defending our freedoms. We are accountable to protect security information in order to maintain our clearances and company proprietary information as a condition of employment. You are our first line of defense when it comes to security. Take the time to learn and apply good security practices and help others when you notice they need your help in doing the same.

Facility security

Perspecta identification (ID) badges are Perspecta property. Your ID badge must be worn and visible at all times while on Perspecta premises. Employees should challenge any person not wearing a Perspecta ID badge. Report the loss or theft of your ID badge immediately to your manager and security.

You are responsible for following security protocols at your location, including badging in and out of a building as required. Smartphones (or cellphones) are not permitted in SCIF areas.

Employees have the responsibility for ensuring that any visitor to a Perspecta site is properly logged in and badged at the applicable reception area. Employees are also responsible for escorting visitors at all times within Perspecta buildings.

We report adverse information

Possession of a security clearance is a privilege, not a right. Under the National Industrial Security Program Operating Manual (NISPOM), Perspecta is required to report adverse information concerning any cleared Perspecta employees. Adverse information is any information that reflects negatively on the integrity or

character of a cleared employee or suggests that his or her ability to safeguard classified information may be impaired. This can include, but is not limited to, information regarding criminal behavior or misconduct, substance abuse, excessive foreign contacts, financial difficulties and mental or emotional disorders that can create security risks.

It is the responsibility of every Perspecta employee to report any adverse information related to a cleared employee to the security organization. Reports based on rumor or innuendo should not be made. Adverse reporting procedures are provided in the NISPOM, Section 3. Please contact your program security representative or facility security officer for any questions about this obligation and the process for adverse information reporting.

We report insider threat information

Perspecta is proud of its legacy and long-standing relationship with the intelligence and defense communities. As such, we are firmly committed to the protection of national security information, systems, and assets as well as our intellectual property, proprietary data and personal identifiable information (PII). Perspecta's insider threat program combines federal government and company requirements into a single-focused program designed to deter, detect, and mitigate actions by employees or individuals who may represent a threat to protected information and assets.

Perspecta's program is built on continuous and aggressive assessments, evaluations, and monitoring of our digital and physical environments. Critical to this approach and the unique nature of insider threats, Perspecta recognizes that a successful program requires an unyielding commitment from its executive leadership and active participation at all levels.

Management commitment and employee participation are reinforced through our security education and training program, which heightens awareness and emphasizes adherence to policies regarding reportable events. It is the responsibility of all Perspecta employees to help protect our company and our information, and that when anyone sees something that is not in accordance to our core values, our ethics or our commitments to ourselves and our government customers we all need to say something.

We maintain a safe and healthy work environment

Perspecta is committed to providing a safe, healthy and productive work environment. You are responsible for complying with all applicable environmental, security and health and safety laws and regulations. This means

observing all posted warnings and regulations and promptly reporting any accidents, injuries, unsafe work conditions and all situations that may pose an environmental, health or safety hazard to the appropriate management representative.

No task is ever so important that it needs to be performed in an unsafe manner, nor should any employee be required to travel to or work in a location he or she believes to be unsafe.

Alcohol, drug and smoke-free workplace

Perspecta is committed to providing a drug- and alcohol-free work environment. You may not be under the influence of alcohol or illegal drugs or abuse legal drugs in the workplace at any time. You are expected to be fit for work and capable of performing your assigned responsibilities in a safe and productive manner.

Perspecta also maintains a tobacco- and smoke-free environment. You may not smoke or sell tobacco products on Perspecta's premises except in designated areas.

Solicitation and postings

Commercial solicitation or distribution on Perspecta premises on behalf of non-Perspecta business enterprises is prohibited at all times. Perspecta employees may not engage in verbal solicitations or engage in the distribution of materials interfering with work during working time, other than for Perspecta business purposes ("working time" does not include time before or after work, or during breaks or lunch periods).

Perspecta employees may not use Perspecta assets or resources for solicitations or distribution of materials, other than for Perspecta business purposes.

It is Perspecta's policy to communicate items of general interest to its employees through the issuance of memoranda and notices through Perspecta web sites. No posters, charts, notices or other display material shall be posted anywhere on Perspecta property except when authorized by human resources or facilities.

Environmental controls

No employee may use hazardous chemicals at a Perspecta facility without a documented work need, appropriate training and prior manager approval consistent with such work need. Every employee authorized to use hazardous chemicals shall acquire, use and dispose of them only in accordance with applicable environmental protection laws.

Make the right choice quiz

Striving to be the best in everything we do means we each have a responsibility to help shape our culture through our personal commitment to meet the highest ethical standards in all we do. Codes and policies alone cannot create a company-wide ethical culture where we all value each other and do business with the highest level of integrity.

If you are faced with a difficult decision, ask yourself the following questions:

- **Is it the right thing to do?**
- **Will my actions be consistent with the Perspecta code of conduct and the law?**
- **Am I aware of all the relevant facts, and have I considered all options?**
- **Will I feel proud and comfortable telling others about the choice I made?**
- **What will my family and friends think of me?**
- **What impact will my action have on my customer, suppliers and other employees?**
- **Will my action result in embarrassment to myself?**
- **What impact will my action have on me?**

If you are still unsure of what to do, continue to seek guidance. Do not hesitate to reach out to the various resources available to you until you have the information you need to make the right choice.

About the Perspecta ethics and compliance office

At Perspecta, we want to uphold the highest standards of integrity, and we want to do more than comply with laws and regulations.

Perspecta's ECO affirms and emphasizes our commitment to ethical conduct. Perspecta's chief of ethics and compliance reports directly to the general counsel, periodically provides reports to the Perspecta Board of Directors and oversees a vigorous company-wide program to promote a positive, inclusive and ethical work environment for all employees. The ECO maintains the confidential Perspecta ethics helpline and is also responsible for conducting investigations into alleged violations of The Standard or other Perspecta policies.

You are encouraged to reach out to the ECO team whenever you have a question or concern that cannot be readily addressed within your work group or through your manager.

If your concern relates to the actions or decisions of the Perspecta ECO, please contact the Perspecta general counsel.

How to contact the Perspecta ethics and compliance office

Call:

Contact the Perspecta ethics helpline at 1.855.ETHICSO or 1.855.384.4270.

This helpline, maintained by EthicsPoint, is available 24 hours a day, 365 days a year.

Website:

File a report online at www.perspecta.ethicspoint.com.

Mail:

Perspecta Inc.

Attention: Ethics and Compliance Office

15052 Conference Center Drive

Chantilly, VA 20151

Fax: 1.571.313.6936

E-mail: ethics@perspecta.com

Anonymous reports may be made through the ethics helpline or the EthicsPoint website.

How to contact the KeyPoint IACC team

The KeyPoint Integrity Assurance and Contract Compliance (IACC) program ensures the overall integrity and compliance of KeyPoint field investigators and other investigative resources' conduct and the background investigations provided to customers. The IACC unit vets, investigates, and resolves any and all issues related to the conduct and/or performance of KeyPoint investigative staff—including employees, independent contractors and subcontractors—as it pertains to their work on background investigations.

Inquiries, concerns, complaints related to Investigative staff as it pertains to conducting field work for background investigations should be directed to IA.concerns@keypoint.us.com or 1.866.775.2323 for reporting and resolution.



1.855.ETHICSO or 1.855.384.4270
www.perspecta.ethicspoint.com.