

# Supplier Code of Ethics



### **OUR VALUES...**

Axient is guided by strong Values. We want our decisions and actions to demonstrate these Values. We believe putting our Values into practice creates long-term benefits for our customers, employees, and suppliers.

### **LEADERSHIP...**

Leaders set objectives and define the direction for the group. Leaders create and embrace change and set the example. Leaders are committed to professional development starting at the lowest levels of the company. Leaders demonstrate initiative and perseverance.

### **INTEGRITY...**

Those with integrity possess strong moral character, exhibit consistency between words and deeds, and do what is right. They establish trust by demonstrating honesty, ethical behavior, and accountability.

### **CUSTOMER RELATIONSHIP / LOYALTY...**

Customer focus is demonstrated by responsive, dependable, empathetic advocacy of customers' needs, goals, and objectives, thereby creating positive word-of-mouth advertising about Axient.

### **COMMUNICATION...**

Effective communicators set clear objectives with explicit, measurable goals and a realistic timeframe for achievement. They are available and approachable and demand performance while providing constructive evaluation and feedback.

### **VISION...**

Having vision is possessing a keen sense of what to do to maximize the potential of the company. It is demonstrated by proactive, forward thinking, and planning that anticipates and delivers performance beyond the company's and customer's current needs.

### **SOUND and TIMELY DECISION MAKING...**

Good decision-making requires good decision analysis. It requires identification of option, clarity of judgment, completeness, thoroughness, decisiveness, and effective implementation. In short, it means getting it correct.

### **CONTINUOUS, MEASURABLE IMPROVEMENT...**

Always look for a better way of doing things. Seek new, innovative opportunities to excel, overcome adversity, and provide alternative, constructive views. Continually improve processes and systems to improve productivity.

We consider our **SUPPLIERS** to be crucial to our success...  
We treat our suppliers with the same respect that we show to our customers and employees.  
Our suppliers deserve fair treatment and honest feedback on their performance and products.

# Introduction

Axient is committed to achieving the highest standards of exceptional engineering services, solutions, and unique hardware/software products. We are committed to customer satisfaction by meeting or exceeding all applicable requirements. Axient strives to continually improve our quality management system. These Supplier Code of Ethics also apply to our third-party resellers, contract laborers, and any other third parties performing or providing services on our behalf.

- **A Supplier Must Maintain the Highest Standards of Ethics and Integrity and Comply with Laws, Regulations, its Contractual Obligations with us, and this Supplier Code of Ethics.**

Our suppliers must act ethically at all times and ensure the integrity of their operations. Acting with integrity means being accountable for the highest standards of behavior. In addition, our suppliers must comply fully with all applicable laws and regulations, their contractual obligations with us, and these Supplier Code of Ethics.

Obeying the law, both in letter and in spirit, is the foundation on which Axient's ethical standards are built. In conducting business with Axient, suppliers must comply with applicable laws, rules, and regulations at all levels of government in the United States and in any other jurisdiction in which the supplier does business.



It is Axient's policy to comply with FAR, other agency, and statutory and regulatory flow down clauses and provisions as cited in the prime and subcontractor contracts regarding products, goods, and services in support of a U.S. Government prime contract. It is also an Axient policy that the quality assurance and quality control is controlled and performed in accordance with Axient's Quality Management System and customary market practices for commercial items to meet contract quality, product conformity, and on-time delivery requirements.

## A Testament To Our Quality Management System

We dedicate time and resources to ensure our products, solutions, and services are developed and delivered using the industry's leading quality control systems.

### ❖ ISO 9001:2008

- Over 10 years operating under an ISO 9001 accredited quality management system.

### ❖ AS9100 Rev C

- Almost 10 years operating with an accredited AS9100 system, the Aerospace industry's highest quality standards.

### ❖ CMMI-DEV Maturity Level 3

- Developing agile and model-based software development solutions using processes appraised at CMMI-DEV Maturity Level 3.

### ❖ DCMA Purchasing System

- Purchasing systems, products, and services using an approved, certified DCMA Purchasing System.

### ❖ DCMA Property System

- Managing government-furnished equipment and property using a certified DCMA Property System.

### ❖ DCAA Accounting System

- Managing government and commercial contracts using a certified DCAA Accounting System.



Seller shall conduct its business fairly, impartially, and in an ethical and proper manner and in doing so Seller shall adhere to Buyer's Code of Ethics, or if available, Seller's version, which is consistent with the terms of Buyer's Code of Ethics. Seller shall not engage in any personal, business, or investment activity that may be defined as a conflict of interest, whether real or perceived. If Seller has cause to believe that Buyer or any employee or agent of Buyer has behaved improperly or unethically under this Subcontract, Seller is encouraged to exert reasonable effort to report such behavior when warranted.

The officers and employees of Axient serve the public trust and are required to fulfill their responsibilities with care and loyalty and for the sole purpose of advancing Axient's best interests. The integrity of Axient must be protected at all times, and the fiduciary relationship of its officers or employees must be honored in both actuality and appearance. A conflict of interest exists when a representative's direct or indirect personal interests are inconsistent with or interfere with the best interests of Axient. To avoid such conflicts, suppliers shall disclose to Axient (i) any direct or indirect personal interests in a supplier held by any officer or employee of Axient; and (ii) any family relationship between an officer or employee of Axient, and any director, officer, or employee of supplier.

The Axient Ethics Hotline can be reached at 855-347-0894 or via email at [ethicshelp@axientcorp.com](mailto:ethicshelp@axientcorp.com).



## **Supplier Labor Practices**

### **Non-discrimination**

Our suppliers should provide equal employment opportunity to all employees and applicants for employment, without any unlawful discrimination.

### **Child Labor**

Suppliers must ensure that child labor is not used in the performance of work. The term "child" refers to any person under the minimum legal age for employment where the work is performed.

### **Human Trafficking**

We fully support the elimination of human trafficking and slavery from the supply chain and do not tolerate any trafficking in persons, both in the U.S. and globally. Suppliers must adhere to regulations prohibiting human trafficking and comply with all applicable local laws in the country or countries in which they operate.

## **Supplier Quality Practices**

### **Quality**

Suppliers must take due care to ensure their work product meets Axient and federal government 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. See FAR 46.101

### **Counterfeit Parts**

We expect our suppliers to develop, implement, and maintain methods and processes appropriate to their products to prevent the introduction of counterfeit parts and materials into deliverable products. Suppliers must ensure that effective processes are in place to detect counterfeit parts and materials, as applicable, and exclude them from the delivered product. See DFARS 252.246-7007

## **Gifts**

We believe our suppliers should compete on the merits of their products and services. The exchange of business courtesies may not be used to gain an unfair competitive advantage or exercise improper influence. In any business relationship our suppliers must ensure that the offering or receipt of any gift or business courtesy is permitted by law and regulation and complies with any contractual obligations. Suppliers must ensure that any exchanges do not violate the rules and standards of the recipient's organization and are consistent with reasonable marketplace customs and practices.

## **Insider Trading**

Our suppliers and their personnel must not use material that is non-publicly disclosed information obtained in the course of their business relationship with us as the basis for trading or for enabling others to trade in the stock or securities of our company or those of any other company.

## **Procurement Integrity**

Our suppliers must maintain the integrity of our procurement and acquisition processes. Suppliers may not improperly use competitors' confidential or proprietary information for their own benefit. If a supplier becomes aware of any such confidential or proprietary information, they should promptly take steps to avoid its improper use and inform our company as appropriate.

## **Fair Dealing**

Suppliers are required to act honestly, in good faith, and with professionalism. No supplier may take unfair advantage of another person through harassment, manipulation, abuse of privileged information, misrepresentation of material facts, or any other unfair practice. Stealing proprietary information, possessing trade secret information that was obtained without the owner's consent, or wrongfully inducing such disclosures by past or present employees of Axient or any other organization is prohibited.

## **The Anti-Kickback Act**

The Anti-Kickback Act of 1986 (41 U.S.C. 51-58) was passed to deter subcontractors from making payments and contractors from accepting payments for the purpose of improperly obtaining or rewarding favorable treatment in connection with a prime contract or subcontract relating to a prime contract.



## Confidentiality of Sensitive Information

Suppliers must maintain the confidentiality of all information entrusted to them by us, our customers, or other third parties, except where disclosure is authorized or legally required (and then only after notice). We require our suppliers to properly handle and protect from improper disclosure any sensitive information, including classified, controlled, proprietary, personal, competition-sensitive, and intellectual property. Information should not be used for any purpose (e.g., advertisement, publicity, and the like) other than the business purpose for which it was provided, unless there is prior authorization from Axient. Suppliers must comply with all contractual obligations and applicable laws, including data privacy laws.

See FAR 52.224-17(d) and DFARS 252.204-7000

## Cybersecurity

Suppliers must take care to safeguard and protect information entrusted to them and information generated or developed by them in support of our programs from unauthorized access, destruction, use, modification, or disclosure. We expect suppliers to have risk-based cybersecurity programs designed to mitigate emerging threats to their information systems, products and services, and supply chain and to comply with all applicable contractual and legal requirements.



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