



Supplier Code of Conduct

“Our commitment to ethical behavior, based on our values, will ensure that we are good partners to all of our customers and that we continue to foster the safe, welcoming and empowering workplace we know Vigor to be.”

*Frank Foti
President & CEO*

Vigor is committed to conducting its business dealings with its suppliers in an honest and ethical manner. We hold ourselves accountable for being aware of, and following, the rules that apply to the work we do. In turn, Vigor expects its suppliers to also follow the rules and adhere to high ethical standards. This Supplier Code of Conduct details the specific standards of conduct that Vigor requires of its suppliers.

Vigor personnel are encouraged to apply our internal Values and Code in their dealings with Vigor’s suppliers. Our employees are not permitted to subject our suppliers to deceptive or misleading information or treatment. Vigor personnel are prohibited from promising or providing anything to a supplier in exchange for any inappropriate advantage, whether for the benefit of the employee or Vigor.

Vigor Values, Code, and Supply Chain Mission

- **Vigor Values**
 - Truth – We actively seek the truth, we actively speak the truth.
 - Responsibility – We act on what we know is right.
 - Evolution – We seek mastery, we adapt to a changing world.
 - Love – We care about the people we work with, and the world we live.

- **Vigor Code**
 - Be Smart: Do the right thing the first time.
 - Be Careful: Do it safe all the time.
 - Be Productive: Do a full day’s work for a full day’s pay... every day.
 - Be Flexible: Do what is needed to get the job done.
 - Be Considerate: Treat everyone with dignity and respect.

- **Vigor’s Supply Chain Mission** – Vigor’s Supply Chain Department is committed to performing as an innovative customer-oriented team that strives to continuously improve Vigor’s Global Supply Chain. We achieve this mission by:
 - Satisfying the needs of our customers.
 - Continuously seeking quality materials at the best possible price and lead time.
 - Developing open and honest supplier partnerships by challenging our suppliers to be best in class.
 - Recognizing and acting upon opportunities for improvement in all aspects of the supply chain.
 - Critical thinking and process evolution to overcome new and ongoing challenges.
 - Doing the right thing, the first time, every time.

Standards of Supplier Conduct

Vigor's suppliers are expected to:

Comply with the laws and regulations applicable to their business.

Make ethical decisions and abide by this Supplier Code of Conduct.

Demonstrate the Vigor Values and Code at all times.

- The U.S. Government is one of Vigor's most important customers. The Government requires its suppliers to abide by specific laws and regulations ensuring ethical business conduct. These requirements apply at both the prime contract and subcontract level. Vigor expects its suppliers to always act with integrity in dealings with the Government and comply with all applicable requirements.
 - **Human Rights** – Vigor expects its suppliers to treat people with dignity and respect and to be truthful and considerate. Vigor suppliers must promote equal opportunity and an inclusive environment, where diversity in people, ethics, and perspectives is valued.
 - **Maintain Accurate Records** – All supplier records must be complete, accurate, and never altered to conceal or misrepresent any transactions. All records must be made available, regardless of format, as evidence of a business transaction, to the extent required by the terms of the contract between Vigor and its supplier or in accordance with applicable laws and regulations.
 - **Human Trafficking** – All suppliers, their subsidiaries, employees, and any person acting on behalf thereof, must adhere to the regulations prohibiting human trafficking, FAR 52.222-50. We expect our suppliers to have a compliance plan in place that at minimum includes awareness training, process for reporting, recruitment and wage plan, prevention, monitoring, detection, termination measures for human trafficking.
 - **Child Labor** – Vigor expects its suppliers to ensure that illegal 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.
 - **Employment Practices** –
 - **Equal Opportunity:** We expect our suppliers to offer equal employment opportunities to all people without regard to race, ethnicity, color, religion, national origin, sex, sexual orientation, age, gender identity, genetics, disability, protected veteran status, marital status, or any other status protected by law.
 - **Harassment:** Vigor will not tolerate harassment of any type, including verbal, physical, emotional, visual, or sexual. This prohibition extends beyond co-workers and includes suppliers, customers, and anyone else who does business with Vigor. Harassment can diminish the dignity of a person, create an offensive or otherwise hostile work environment, and interfere with work performance.
 - **Drug, Alcohol, and Tobacco Free Workplace:** The use of prohibited drugs, unauthorized prescription drugs or alcohol abuse can create serious safety risks. The possession, sale, or use of prohibited drugs and/or unauthorized prescription drugs, or being under the influence of such drugs, on Vigor property, or at Vigor-sponsored events is prohibited. All Vigor facilities are also tobacco free. Smoking, chewing, or other ingestion of tobacco within

a Vigor campus is prohibited. Vigor expects its suppliers to maintain a workplace free from illegal use, possession, sale, or distribution of controlled substances.

- **Anti-corruption, Anti-Trust, and Lobbying**
 - Anti-corruption: Our suppliers must comply with anti-corruption laws, regulations, or directives in all countries they perform business. We expect our suppliers to comply with all applicable anticorruption laws and Vigor unequivocally forbids its suppliers from offering, soliciting, or accepting any bribe, illegal gratuity, or kickback.
 - Anti-trust: Our suppliers must not engage in bid suppression, complementary bidding, bid rotation, price fixing, or sharing of bids with competition.
 - Lobbying: Lobbying activities are subject to specific rules that cover a wide range of activities. “Lobbying” involves communications with legislators, regulators, or their staff in an effort to influence legislative or certain other administrative actions. For this reason, it is important that all contacts with officials that may influence a government contract, as all lobbying activities are regulated at the local, state and federal levels and are subject to disclosure (Public Law 101-121 and FAR 52.203-12). It is the Suppliers responsibility to certify to Vigor that they have not used appropriated funds to influence the award of federal contracts or financial transactions.

- **Gifts, Entertainment, and Conflicts of Interest:**
 - Gifts/Business Courtesies: The exchange of business courtesies may not be used to gain an unfair advantage. In any business relationship, our suppliers must ensure that the offering or receipt of any gift of 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.
 - Conflicts of Interest: Suppliers must avoid all actual or apparent conflicts of interest in their dealings with Vigor. We expect our suppliers to provide notification to all affected parties in the event that an actual or potential conflict of interest arises, whether personal or organizational.

- **Global Trade Compliance**
 - Import and Export: Vigor expects its suppliers to ensure that their business practices are in accordance with all applicable laws and regulations governing the import or export of items, services, or information. If applicable, suppliers must register with the U.S. State Department’s Directorate of Defense Trade Controls.
 - Anti-Boycott: Congress has passed laws prohibiting companies from participating in foreign boycotts that the U.S. does not sanction because they run counter to U.S. policy. Vigor’s suppliers must not comply with, further, or support any unsanctioned boycott.

- **Quality**
 - Delivering quality products and services that meet our customers’ requirements is critical. Our suppliers must have a quality assurance process in place and will be required to meet or exceed our contract requirements.

- **Safety/Environmental**
 - We are committed to conducting operations and activities in a manner that provides and maintains safe and healthful working conditions, protects the environment and conserves natural resources. In meeting this commitment, it is Vigor’s policy that no one shall engage in any conduct that violates any environmental, health, or safety laws, or is otherwise

inconsistent with the highest levels of corporate responsibility to the health and safety needs of our employees and the environmental needs of our communities.

- Vigor is committed to conducting operations and activities in a manner that protects the environment and conserves natural resources. Vigor's policy is that no Supplier shall engage in conduct that violates environmental laws or regulations. We are also committed to the continual improvement of our environmental management systems as well as the prevention of pollution and ask that our suppliers commit to this as well.
- **Confidential and Proprietary Information Protection and Security**
 - Vigor expects its suppliers to properly handle, store and secure sensitive information such as confidential or proprietary information or personally identifiable information. Suppliers must comply with applicable data privacy laws. Additionally, Vigor's suppliers must use appropriate physical and electronic security measures to protect information against unauthorized access, use, destruction, modification or disclosure and ensure compliance with DFARS clause 252.204-7012 – "Safeguarding Covered Defense Information" when applicable. Such information should not be used for any other purpose than the specific business purpose for which it was provided.
- **Intellectual Property Protection**
 - Vigor requires its suppliers to comply with all laws governing use, disclosure and protection of intellectual property, including patents, copyrights, trademarks and service marks.
- **Counterfeit Parts**
 - Vigor expects its suppliers to develop, implement, and maintain policies, procedures and methods to detect and avoid introducing counterfeit parts and materials into deliverable products, including complying with DFARS 252.246-7007 as applicable. Our suppliers must promptly notify us and recipients of counterfeit parts when appropriate.
- **Ethics Program**
 - Vigor's suppliers must have effective systems in place to comply with laws, regulations and the standards set forth in this Supplier Code of Conduct, including systems that ensure compliance with FAR 52.203-13 as applicable. Additionally, we expect our suppliers to provide their employees with reasonable avenues to raise legal or ethical concerns without fear of retaliation and take preventative or corrective action when warranted.
- **Consequences for Violating Code**
 - Vigor 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, Vigor may be required to report such violations to the proper authorities.