

At SNC we hold ourselves and our employees to the highest ethical standards. Adherence to such standards is not just the right thing to do—it is essential for success with our customers, suppliers, and colleagues. Our ethics and principles are built upon our values of integrity, innovative, agility, passion, and perseverance. This document summarizes many of our important company ethics policies.

*SNC expects all employees to have "Gold Standard Ethics."*

## Guiding Principles

### SNC is committed to:

- Integrity and good judgement in business dealings
- Highest quality service, products, and interactions with customers, suppliers, the public, and each other
- Compliance to laws, regulations, and responsible safety and business principles
- Providing a fair, safe, and collegial work environment
- Employee support via the Ethics Committee
- Fair and impartial selection of suppliers, always seeking best value
- Serving as a responsible and ethical member of the business community
- Contributing to the betterment of society in the communities it conducts business

### SNC employees will:

- Exercise integrity and personal responsibility
- Follow SNC ethics principles in all they do
- Annually recertify their commitment to the SNC Ethics Program
- Protect confidential and proprietary information
- Avoid and report any conflicts of interest

As a contractor with the federal government, SNC will comply with all legal and ethical requirements of the U.S. government and any other appropriate jurisdictions. The company will accurately, completely, and truthfully:

- Record and allocate costs and labor
- Prepare and negotiate proposals
- Design, manufacture, and test products

In SNC's international relations, the company will strictly follow and enforce:

- International Traffic in Arms Regulations (ITAR)
- Export Administration Act (EAA) & Regulations (EAR)
- Arms Export Control Act
- Foreign Corrupt Practices Act (FCPA)
- Competition and antitrust requirements

These principles are the standard for all SNC employees, agents and representatives, and are expected to be followed when carrying out responsibilities for or on behalf of the company.

## SNC Ethics Program

SNC protects its **"Gold Standard Ethics"** via a formal Ethics Program. The Ethics Committee provides guidance to reinforce strong company ethics.

The purpose of the Ethics Program is to ensure that SNC:

- Promotes a culture that encourages the highest standards of ethical business conduct
- Complies with applicable laws
- Exercises appropriate due diligence to prevent unlawful conduct
- Protects its reputation & good name

The **SNC Statement of Ethics & Principles** and the **Code of Ethics and Business Conduct** outline what is expected to maintain a culture of ethical practices and compliance.

- The Statement summarizes the core ethical principles that should guide all SNC employees when conducting business on behalf of the company.
- The Code discusses employee obligations in specific contexts and identifies the procedures through which SNC maintains its culture of ethical practices.

In addition to the Code's requirements, employees are responsible for knowing, understanding and acting in a manner consistent with the laws and regulations that cover their activities on behalf of SNC.

The Code and relevant statutory and regulatory requirements will not address every ethics question an employee may face. Employees are urged to also rely on their own personal integrity, common sense, and good judgment when determining the appropriate course of action. Employees are also encouraged to consult with their manager and local HR Business Partner if they have questions concerning the best course of action in a particular circumstance.