



Code of Ethics and Business Conduct

Systems & Technology Research LLC

2023



Dear Colleagues:

STR's Ethics & Compliance (E&C) program is an essential part of operating STR with the highest level of integrity. Being an ethical organization is important to our customers, partners, and employees. A key goal of our E&C program is to ensure that doing the right thing is a cultural norm and represents standard operating procedure. Our E&C program is part of our business strategy, ensuring that STR leaders and staff make ethical decisions and employees feel comfortable speaking up about potential ethics and compliance violations.

The foundation for our E&C program is this Code of Ethics and Business Conduct. Our Code outlines how we will conduct business activities with integrity and the highest standards. It highlights the importance of individuals being free to speak up without fear of retaliation. It also outlines our commitments to each other, to our company and shareholders, to our business partners, and to our government clients.

The Code does not address every situation you might encounter, and you will need to use your sound judgment to act legally and ethically in your interactions with each other, our clients, and our partners. STR's Chief Ethics & Compliance Officer (CECO) can serve as a resource. The CECO also leads STR's response when issues are reported where we may have fallen short in meeting these obligations. The CECO's independent reporting channel directly to the STR Board of Director's Governance Committee ensures E&C issues are given proper attention.

We are all required to read and abide by our Code of Ethics and Business Conduct. Thank you for giving it your full attention. I appreciate your commitment to ethics and compliance at STR.

Mark Luetzgen



Table of Contents

A Message from the CEO	1
Introduction	4
Asking Questions, Reporting Concerns, and Doing the Right Thing	5
Making Ethical Decisions	5
Asking Questions, Reporting Concerns	5
Investigating Concerns	6
Disciplinary Action.....	6
Additional Rights.....	6
Zero Tolerance for Retaliation	6
Leading Responsibly	7
Cooperating with Government Investigations and Inquiries	7
Our Commitment to Each Other	8
Preventing Harassment and Discrimination	8
Protecting Our Personal Data	8
Creating a Safe Workplace	8
Respecting One Another	9
Our Commitment to Our Company and Shareholders	9
Conflicts of Interest	9
Outside Employment.....	10
Protecting Company Assets	10
Handling External Communications	11
Using Social Media	11
Maintaining Accurate Books and Records	12
Trading Responsibly	13
Our Commitment to Our Business Partners	13
Ensuring Fair Competition	13
Appropriate Use of Competitive Information and Customer/Supplier Information	13
Gifts	14
Setting High Expectations for Our Suppliers and Contractors	14
Our Commitment as a Government Contractor	15
Submissions of Claims to the Government	15
Labor Charging	15
Avoiding Kickbacks	15
Lobbying Restrictions	16
Procurement Integrity.....	16



Truth in Negotiations Act.....	16
Employing Current and Former Government Personnel.....	16
Suspended/Debarred Companies or Individuals	17
Foreign Corrupt Practices Act	17
Anti-Boycott Laws	17
Complying with Trade Controls.....	17
Mandatory Disclosures to the Government	18
Conclusion	18



Introduction

The reputation and integrity of Systems & Technology Research (STR) depends upon each of us assuming a personal responsibility for our business conduct.

STR is committed to conducting all business activities with the highest ethical standards. Our Code of Ethics and Business Conduct details what we expect from ourselves and from each other as well as our commitment to integrity. Living our values is critical for STR's continued success.

Our Code of Ethics and Business Conduct is the foundation of our compliance and ethics program and guides us in our daily work. It explains the standards and provides guidance for the legal and ethical responsibilities expected of us.

We all share a commitment to integrity, regardless of position, location, or level of seniority. We each have a responsibility to:

- understand the policies, procedures, and laws that apply to our work;
- comply with the Code of Ethics and Business Conduct, policies and all applicable laws and regulations;
- maintain appropriate ethical behavior;
- ask questions if you are unsure or need guidance on where to find information;
- report (and never ignore) any known or suspected violations of our Code of Ethics and Business Conduct, policies, laws, or other requirements; and
- participate each year in our compliance certification process, when each of us is asked to certify our compliance by reading and acknowledging the STR Employee Handbook.

In addition, STR collaborates with business partners who share our values. If you are responsible for selecting or interacting with suppliers, agents, business partners, or consultants, be aware that our company expects those third parties to adhere to the same high ethical standards as we do.

While our Code of Ethics and Business Conduct discusses a number of areas, it is not possible for one document to address every ethical or legal situation we may face. When in doubt about the best course of action, you should seek guidance from your supervisor, Human Resources, the Chief Ethics & Compliance Officer, or any of the resources provided in our Code of Ethics and Business Conduct.



Asking Questions, Reporting Concerns, and Doing the Right Thing

Making Ethical Decisions

There are times when you may be unsure of what the right thing to do is. Not all issues are straightforward. In these situations, ask yourself the following questions:

- What are the facts surrounding your issue? Are you relying on rumors or assumptions?
- How would you feel or like to be treated if you were in a similar situation?
- What STR policies and procedures as well as Federal and State regulations apply to this situation?
- What guidance have you received from your supervisor and company leaders? Have you brought your questions or concerns to anyone's attention?

Although these questions will provide guidance in decision-making, if you are unsure about what to do, or have a sense that something may not be quite right, ask questions and seek guidance from any of the resources listed in our Code.

Asking Questions, Reporting Concerns

If you become aware of a situation that may involve a violation of our Code, company policy or the law, you have a responsibility to report it to one of the contacts listed here. Reporting actual or suspected misconduct allows our company to investigate potential problems, stop actual misconduct, and prevent future issues that could damage our reputation as an industry leader.

To seek guidance or report a concern, you may contact any of the following resources:

- your supervisor, another manager, or senior staff member you trust;
- your HR Business Partner or the Chief Human Resources Officer (CHRO);
- the Chief Ethics & Compliance Officer;
- the President & CEO, Executive Vice President & CTO, a Senior Vice President, a Vice President; or
- the Chairman or a Member of the Board of Directors.



You may also file a report with the STR Confidential Reporting Hotline. The Hotline is managed by a third party and is available online at <https://report.syntrio.com/STR> or by phone at 855-591-0576. Reports can be filed anonymously.

You may also report a concern by contacting an external reporting authority, including the Department of Defense Inspector General. The Office of Inspector General's DoD Hotline is available online at <https://www.dodig.mil/Components/Administrative-Investigations/DoD-Hotline/> or by phone at 800-424-9098.

Investigating Concerns. You may, from time to time, be asked by the company for assistance in an investigation of a concern or issue. You have an obligation to cooperate fully and completely and provide truthful and accurate information. Any effort to hinder an investigation, such as by destroying or altering documents or other evidence or by encouraging others to provide untrue information, violates this policy and could also subject individuals to prosecution for obstructing an investigation.

Disciplinary Action. STR reviews and evaluates every concern, question, and allegation of wrongdoing, regardless of how it is reported. These reviews will always be prompt and professional, respecting the rights of everyone concerned.

In the event an investigation reveals that a violation of our Code, our policies, or the law has occurred, STR will act as it deems appropriate or necessary, consistent with the law. Depending on the circumstances, this may include disciplinary action, including termination. Individuals may also be subject to civil or criminal prosecution if they have violated the law.

Additional Rights. Federal law prohibits reprisal against contractor employees who, in connection with U.S. government contracts, report internally or to certain government officials or entities information the employee reasonable believes is evidence of gross mismanagement or waste, abuse of authority, violation of law, or a substantial and specific danger to public health and safety. Complaints may be filed with the Department of Defense Inspector General.

Zero Tolerance for Retaliation

STR is committed to creating an environment where we can report suspected violations, participate in investigations, and engage in any other legally protected activities without fear of retribution or retaliation. STR's Reporting and Anti-Retaliation Policy prohibits retaliation of any kind against employees for raising an ethical or legal concern or for participating in an investigation in good faith. Acting in "good faith" means that you have given all the information you have and have made a sincere report — it doesn't mean that your report must turn out to be an actual violation. Individuals who do retaliate against others will be subject to



disciplinary action, up to and including termination. STR has a zero-tolerance policy for retaliation.

If you feel you or someone else is being retaliated against, report the situation immediately to your supervisor, Human Resources, the Chief Ethics & Compliance Officer, or the Hotline.

Leading Responsibly

Regardless of your position or level at STR, you should lead by example, demonstrate integrity, and promote compliance with our Code. Supervisors have a special responsibility as leaders to act in a manner reflecting their position of trust and influence. If you are a supervisor, you must:

- act as a role model by demonstrating a commitment to the STR culture of integrity, compliance, and ethics;
- ensure that those who report to you have access to the information and training necessary to perform their work in compliance with our Code;
- create an environment where colleagues feel comfortable asking questions and raising concerns;
- maintain separate reporting channels if familial relationships should arise (family members cannot be in the same chain of command);
- respond promptly to any concerns raised and be supportive of those who raise concerns in an honest manner;
- never engage in retaliation against those who raise concerns; and
- promptly report through appropriate channels all information received concerning any potential violation of company policy, regulations, or the law.

Cooperating with Government Investigations and Inquiries

As a government contractor, STR may occasionally be asked for information from our agency clients or other federal authorities. STR will be open and transparent in its dealings with government officials. It is imperative that employees deal with government officials and members of law enforcement cooperatively and honestly. All such requests for information should be reported to Legal to ensure a coordinated and complete response.



Our Commitment to Each Other

Preventing Harassment and Discrimination

STR is committed to providing a work environment free of unlawful discrimination and harassment. Our expectations and more detailed information is set forth in detail in the Employee Handbook, Section 3.3 Preventing Harassment and Discrimination Policy.

Protecting Our Personal Data

Each of us provides personal information to STR with confidence that it will be used for appropriate business purposes and will be properly safeguarded. To uphold this sense of trust, we must each ensure that we respect the privacy of our co-workers. When we collect, access, use and disclose personally identifiable data, we must do so ethically and in accordance with all applicable legal requirements, including local privacy and data protection laws. “Personally identifiable data” refers to any information that can be used to identify, contact, or locate the person to whom the data relates. Examples include home addresses or telephone numbers, payroll information, performance evaluations, and employment records. If your job responsibilities include handling such information, you must take the necessary steps to protect it. Do not share this information with anyone, including your coworkers, unless they have a business need to know it and you have the authority to do so.

Creating a Safe Workplace

The greatest asset of STR is its people, which means safety, along with preventing illness and injury, is a key priority. We comply with all applicable health and safety rules, laws and regulations, as well as all posted safety procedures within our areas of operation. Training and regular safety audits are essential for understanding and complying with these safety requirements.

No activity is so important that we cannot take the time to do it safely. All employees and contractors have the responsibility and authority to stop work that they believe is unsafe. We promote safe work practices and avoid risk to our fellow employees, our neighbors, and the environment. If you have a concern about workplace health, safety, or security, please contact your supervisor or any of the resources provided in [Asking Questions, Reporting Concerns](#).

We must all do our part to maintain a safe, healthful, and productive work environment for our fellow employees.

Firearms and weapons are strictly prohibited on company property or on the person of any employee when conducting company business on or off company property.



Respecting One Another

STR is committed to offering an environment that fosters mutual dignity and respect. This brings out the full potential in each of us, which, in turn, contributes directly to our business success.

All STR employees are expected to support an inclusive workplace through awareness and adherence to the policies outlined in the Employee Handbook, Section 3: Commitment to an Inclusive Work Environment. In addition, STR employees are expected to adhere to the following conduct standards:

- Treat others with dignity and respect at all times.
- Refrain from language and behavior which is disrespectful, abusive, offensive, or unwelcome.
- Foster teamwork and employee participation, encouraging the representation of different employee perspectives.
- Be open-minded and listen when given constructive feedback regarding others' perception of your conduct.

STR will not tolerate any behavior that is disrespectful, abusive, offensive, or unwelcome. Employees are encouraged to report such behavior to their manager, their HR Business Partner, the CHRO of HR, or the CEO so that the issue can be addressed.

Our Commitment to Our Company and Shareholders

STR is committed to complying with all applicable laws and regulations and following sound business practices to protect the company from unnecessary scrutiny or litigation, reputational damage, and government enforcement actions. We promote a culture of integrity and compliance and believe that it is crucial to conduct business with the highest ethical standards.

Conflicts of Interest

STR respects our right to manage our personal affairs and investments and does not wish to intrude on our personal lives. Nonetheless, we do have a responsibility to avoid any situation that could present a conflict between our personal interests and our company's interests.

A "conflict of interest" occurs when our private interests interfere in any way with the interests of STR. If your duties involve dealing with business partners, customers, suppliers, competitors, or anyone who does, or seeks to do, business with STR, you should take particular care that you always act in the best interest of STR.



To uphold our company's reputation, it is equally important to avoid the appearance of a conflict of interest and any situation where a reasonable observer might assume that you are not acting objectively on behalf of STR.

You should fully disclose any actions that might involve a conflict of interest, or the appearance of one, in writing to your supervisor for review and approval as soon as the conflict arises. Anyone who knowingly fails to disclose a conflict is subject to discipline, including termination.

STR is aware that organizational conflicts of interest may jeopardize our business opportunities with the federal government and must be avoided.

Bribery and Corruption

STR takes its commitment to integrity very seriously and does not tolerate bribery in any form. We must never offer, pay, solicit, or accept bribes or kickbacks in any form, whether directly or indirectly.

It is never permissible to offer anything of value for corrupt purposes, such as obtaining favorable treatment with a respective customer. STR complies with all anti-bribery and corruption laws and prohibits anyone from offering, soliciting, or accepting any bribe, whether dealing with government officials, political parties, or representatives of commercial organizations. "Bribes" does not mean just money, but anything of value, including gifts, entertainment, or other favors solicited or received for an improper purpose. We expect this same integrity from all third parties, agents, and anyone else with whom we work.

Outside Employment

Employment outside of STR is limited to work that does not pose a conflict of interest, must not interfere with job responsibilities or performance, and must be performed outside of STR work hours. To minimize the potential for a conflict of interest, employees should inform their supervisor and HR Business Partner if performing outside work. Some examples of acceptable employment include professor/teaching positions, fitness class instructor, and retail.

Protecting Company Assets

We are entrusted with STR assets and proprietary information daily so that we may effectively do our jobs. This trust is paired with a responsibility to diligently safeguard those assets against loss, theft, or misuse.

Our creativity and innovative ideas make significant contributions to STR's continued success in the marketplace. If you plan to act as a consultant to the government or other companies, you must notify HR. We must protect and leverage company intellectual property, which includes inventions, discoveries, improvements, ideas, computer programs and related documentation, trademarks, patents, copyrights, and proprietary information.



Examples of proprietary or confidential information include:

- business research and new product plans;
- objectives and strategies;
- unpublished financial or pricing information;
- proposed asset acquisitions or dispositions;
- processes and formulas;
- salary and benefits data;
- employee medical information; and
- employee, customer, and supplier lists.

To ensure that our company's proprietary and confidential information is properly protected, we may disclose it to individuals outside of STR only when authorized or legally required to do so. We also must take care to only discuss this information with colleagues who have a business need to know it. Take care not to lose, misplace, or leave confidential information (or electronic devices containing such information) unattended. In addition, never discuss this information where those who do not have a business need to know it might overhear (such as airport terminals, trains, restaurants, and company break rooms). Any information we create during our employment belongs to STR. When leaving STR, all proprietary information in your possession must be returned. In addition, your obligation to protect company proprietary and confidential information continues even after your departure. And, our company must prevent acts of industrial espionage and sabotage.

Handling External Communications

To preserve our reputation for integrity, we must ensure that our communications with the public give an accurate and honest picture of our business operations, transactions, and plans. It is important for us to speak about STR with one consistent voice. Therefore, we may not make public statements on STR's behalf unless we have been designated as a company spokesperson. If an investor, security analyst, press agent, or other key public contact requests information from you, even if the request is informal, please refer them to the President & CEO.

Using Social Media

Online communities are fundamentally changing the way individuals and businesses communicate. Social media platforms allow us to share our expertise, insight, and spirit with the general public. The careless use of social media can pose unnecessary risks to company proprietary and confidential information and our



excellent reputation. To minimize risk to STR and our employees, guidelines have been established to provide us with parameters and clarity on what is and what is not acceptable online behavior. In general, when using social media, you should ensure that you always follow company policies, procedures, and standards. You must:

- never make representations on behalf of STR unless you have authorization to do so;
- protect company assets and confidential information, always remembering that the Internet is a public place; and
- be respectful toward STR, your fellow employees, partners, and your community.

Remember that electronic messages (such as emails and text messages) are permanent, transferable records of our communications and can affect the reputation of STR. If you believe that company electronic communications systems are being used inappropriately, report the matter to your supervisor or any of the other contacts listed in [Asking Questions, Reporting Concerns](#).

Maintaining Accurate Books and Records

We must each do our part to make certain that the financial documents that STR discloses to the public are accurate and truthful. While it may not seem as though the information we generate has an impact on company financial records, we all play a role in ensuring this important duty is fulfilled. Therefore, every piece of data or information that we submit in company records and operating reports must be accurate, complete, and reliable. This includes all operating reports or records prepared for internal or external purposes.

Many of these records are critical to the management of our business. Make sure all your records are truthful and accurate. Never keep unrecorded or “off-the-books” funds or assets for any purpose.

STR has established accounting standards and procedures to ensure that assets are protected and properly used, and that financial records and reports are accurate and reliable. We all share the responsibility for maintaining and complying with these required internal controls.

If you notice any accounting or auditing irregularities, or incidents of fraud by individuals responsible for STR’s accounting or financial reporting, you have a responsibility to report your observation using any of the avenues provided in this Code.



Trading Responsibly

During the course of our work, we may learn “inside information” about our company or our suppliers, business partners or other organizations. “Inside information” is information that is nonpublic and material, meaning that it has not been publicly released and has the potential to influence an investor to buy, sell, or hold a security. It is prohibited for you to buy or sell the stock of any company when you are in possession of material, nonpublic information.

Our Commitment to Our Business Partners

Ensuring Fair Competition

Competition laws are designed to ensure a fair and competitive free-market system. While STR competes vigorously in the marketplace, we comply with all applicable competition and antitrust laws. This means we compete by applying our knowledge, technology, and skill.

Appropriate Use of Competitive Information and Customer/Supplier Information

Competitive information is a valuable tool that allows us to understand and manage our business. We are expected to gather and use that information in an ethical manner and in compliance with the law.

It is inappropriate to obtain or attempt to obtain confidential and proprietary information of STR’s competitors. Under no circumstances may anyone introduce another company’s confidential or proprietary information into STR’s business or systems.

Employees of competitors or suppliers should not be asked to reveal proprietary information. Likewise, our employees should never divulge proprietary information about their former employers. The records we maintain on our customers should only be used for STR business purposes. This information may only be released with proper authorization and for legitimate business reasons to do so.

Even when we have the right to use proprietary information or intellectual property belonging to someone else, we must always respect trademarks and copyrighted material, including information publicly available on websites and software. If we are using intellectual property that does not belong to us, we need to follow all applicable license terms carefully. If you suspect that any proprietary or nonpublic information about our competitors or suppliers has been obtained improperly or received in error (such as misdirected faxes or bid information), you must not use this information. In this situation, you should consult your supervisor. Additionally, we must ensure that consultants and contractors engaged by STR are aware of and follow these guidelines.



Gifts

STR employees and their immediate family members are prohibited from receiving gifts from outside organizations, vendors or individuals, with which STR has, or reasonably could have, a business relationship. If gifts are delivered to the facility, such gifts shall be provided to the Senior Vice President of Business Operations, who will dispose of them or, if shareable, put them in a public place for any employee to share in.

Our business transactions should always be free from even a perception that favorable treatment was sought, received, or offered through gifts, favors, hospitality, entertainment, or similar gratuities.

The U.S. Government is our largest customer, and we must respect the special laws surrounding contracting with the U.S. Government. With few exceptions, U.S. Government agencies have strict prohibitions against their employees accepting any business courtesies. Therefore, except as otherwise permitted by law or regulation, we are prohibited from offering or providing any business courtesy, including meals, entertainment, travel, or lodging expenses for any U.S. Government employee or representative. Modest refreshments, such as soft drinks, tea, coffee, and fruit offered on an occasional basis, in conjunction with business activities, may be acceptable. If you deal with representatives of a particular federal agency, you are responsible for complying with that agency's standards of conduct. Similarly, those who deal with U.S. state or local government officials are responsible for knowing and adhering to the rules that may apply to such state or local government employees. Generally, such officials are often under prohibitions similar to those of U.S. Federal Government employees. Because the gift rules applicable to federal employees are complicated you should get advice from the Chief Ethics & Compliance Officer if you are considering providing anything of value to a government employee.

Setting High Expectations for Our Suppliers and Contractors

STR believes in working with business partners who demonstrate high standards of ethical business conduct. We expect suppliers, contractors, and others who work on our behalf to be guided by the standards set forth in our Code.

We must exercise good judgment in selecting suppliers, contractors, and other business partners. We will not knowingly use suppliers or contractors who operate unethically, or who violate applicable laws. We will not engage suppliers or contractors who compete unfairly or use unfair business practices. We work with all business partners to ensure compliance with applicable laws and regulations when they provide goods and services to STR.

You have a responsibility to report any misconduct by a supplier, contractor, or other business partner to your supervisor or any of the contacts listed in this Code.



Our Commitment as a Government Contractor

STR is committed to following all federal laws, regulations, and contract requirements. Employees should report any compliance failures or questions to the Chief Ethics & Compliance Officer or the Hotline.

As a government contractor, we should expect heightened scrutiny regarding compliance with the rules and regulations applicable to companies doing business with the government. Accordingly, we must ensure that our products and services are delivered and administered in a manner that fully complies with laws, regulations, and our contracts. The laws and regulations applicable to government contractors apply both when STR is acting as a prime contractor and as a subcontractor at any tier. Consultants and subcontractors that are hired by STR to perform work related to a government contract or subcontract must also adhere to government contracting rules.

Some of the laws and regulations that apply to us in our work as a government contractor are set forth below.

Submissions of Claims to the Government

The law provides for significant damages and penalties for any government contractor who “knowingly” submits false claims to the government. “Knowingly” means claims that are intentionally inaccurate, as well as those that are recklessly submitted without verification that the work was performed in compliance with the requirements or without assuring that the claim is accurate. The laws and regulations associated with doing business with the government are varied and complex. In all circumstances, we must ensure full compliance with applicable requirements and we must carefully review any claims for payments. Any and all communications with the government must be truthful, accurate, and complete.

Labor Charging

STR will maintain a high standard of accuracy and completeness in all of its financial records and this includes our obligation to ensure timely and accurate labor charging. The Employee Handbook, Section 4.4: Labor Charging Policy, guides employees and managers on how to accomplish this.

Avoiding Kickbacks

Soliciting or accepting anything of value to influence award of, or work under, a U.S. government contract or subcontract is a violation of the anti-kickback laws. A “kickback” is providing something of value either to reward or obtain favorable treatment on a government contract. There are serious consequences associated with failing to disclose a potential kickback. Accordingly, if you have reason to believe that a bribe or kickback has been offered or accepted, you must immediately



report this to the Chief Ethics & Compliance Officer, the Hotline, and/or the President & CEO.

Lobbying Restrictions

This law prohibits the use of contract payments to pay any person for influencing, or attempting to influence, officials of the executive or legislative branches of the U.S. Government in connection with the award or modification of U.S. Government contracts. Any questions about the propriety of payments should be raised with the Chief Ethics & Compliance Officer, the Hotline, and/or the President & CEO.

Procurement Integrity

The “Procurement Integrity Act” provides a series of prohibitions designed to protect the integrity of the procurement process by ensuring that competitors for government contracts compete on a level playing field. The basic principles reflect that competitors, as well as government procurement officials, may not solicit, obtain, or disclose contractor bid and proposal or other proprietary or confidential information during the course of a competition. These proscriptions also restrict employment discussions with current or former U.S. Government personnel involved in competitions in which STR has an interest. If you receive any information that might be construed as proprietary to the government or source selection information, or if you have any questions about these laws and regulations, you should contact the Chief Ethics & Compliance Officer, the Hotline and/or the President & CEO.

Truth in Negotiations Act

All cost and pricing data in support of our proposals must be accurate, complete, and current as of the date of final agreement on price. Whether you are the contract negotiator, the cost estimator, or the person responsible for furnishing data to the cost estimator, you must ensure that the data meets the Federal Acquisition Regulation (FAR) requirements.

If you have a question as to whether information is cost or pricing data that must be disclosed to the U.S. Government, you should seek advice from STR’s Finance or Contracts Groups. Any doubts should be resolved in favor of disclosure.

Employing Current and Former Government Personnel

There are a series of laws and regulations that limit the ability to discuss employment or consulting opportunities with individuals who are currently employees of the U.S. Government. In general, the applicable laws and regulations prohibit any government contractor from gaining a competitive advantage or obtaining “inside” government information from government employees by engaging in employment discussions. You should consult with the Human Resources or the



Chief Ethics & Compliance Officer if you are considering discussing employment with a government official.

Suspended/Debarred Companies or Individuals

STR may not conduct any government-related business with any individual or company that has been suspended or debarred. STR will not hire any suspended or debarred individuals. Employees who are suspended or debarred will be excluded from any work relating to obtaining or performing government contracts in accordance with federal law and regulations.

Foreign Corrupt Practices Act

The Foreign Corrupt Practices Act prohibits offering, soliciting, or providing anything of value to a foreign official, or accepting anything of value from a foreign official, for the purpose of improperly influencing decision-making. It also prohibits unlawful political contributions to obtain or retain business overseas. Finally, the act prohibits the use of false records or accounts in the conduct of STR's business.

Anti-Boycott Laws

As a U.S.-based company, everyone at STR must comply with U.S. laws pertaining to unsanctioned foreign boycotts (boycotts maintained by a foreign country against a country friendly to the United States). As part of the U.S. Anti-Boycott Act, for unsanctioned boycotts, it is unlawful to “furnish information about our company’s (or any person’s) past, present, or prospective relationship with boycotted countries or blacklisted companies; or to pay, honor, or confirm letters of credit containing boycott provisions.”

Complying with Trade Controls

Any STR product, service, or technology that is created in one country and then sent across that country’s borders can be considered an export. Exports include more than just the transfer of a physical item from one place to another; exports can also include the transfer of information via email or a face-to-face conversation. Export laws and regulations often restrict our sale of technical data, hardware, and/or services. In addition to monitoring export activities, most countries also have regulations that govern the entry or import of products, services, and technologies to within their borders.

There are serious penalties for violation of these laws, including the loss of export privileges as well as civil and criminal penalties. We must understand and comply with the laws affecting our import and export activities, follow Company procedures, and seek guidance if we have questions.

See Employee Handbook, Section 4.6: U.S. Export Controls, for more information.



Mandatory Disclosures to the Government

STR is committed to transparency and will comply with the regulatory requirement to disclose to the Government, in writing, situations where there is credible evidence of a potential violation of the civil False Claims Act or federal criminal laws involving fraud, conflicts of interest, bribery or gratuities.

Conclusion

There will be situations you encounter that this Code does not address. In those circumstances, you should consult with the STR resources available and strive to make decisions using sound, ethical judgment.

We need to know when we may have fallen short in achieving our high standards. STR strives to create a workplace where you feel free to speak up and raise questions or concerns without fear of retaliation. You can safely and confidentially raise your concerns via the Hotline or to any manager, Human Resources, the Chief Ethics & Compliance Officer, or the President/CEO, without fear of retaliation.

Thank you for sharing in the commitments expressed in this Code.

STR CONFIDENTIAL REPORTING HOTLINE



Have a concern or issue you would like to report? You can share – even anonymously – online at:

<https://report.syntrio.com/STR>

or call:

833-591-0576

Examples include but are not limited to:

- Code of Ethics and Business Conduct
- Discrimination or Harassment
- Improper Accounting/Labor Charging
- Non-compliance with Law
- Retaliation
- Safety, Security, or Health
- Theft, Fraud, or Bribery