

## Ethics & Compliance Standards for CRYPTERA's Suppliers

It is critical that all CRYPTERA's suppliers share our commitment to business with integrity

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These standards apply to individuals/organizations that provide services, raw material, active ingredients, components, finished goods, or other products ("Suppliers"). Where they exist, Supplier's own written ethics and compliance standards may replace these Standards if they meet Cryptera's expectations and are incorporated into a written agreement

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### ADHERANCE TO APPLICABLE LAWS & REGULATIONS

- ❖ Suppliers must comply with applicable laws, rules, regulations, and Cryptera's high ethical standards.

### PROHIBITION OF BRIBES, KICKBACKS, UNLAWFUL PAYMENTS, AND OTHER CORRUPT PRACTICES

- ❖ Suppliers are prohibited from directly or indirectly paying anything of value to a government official in order to:
  - Obtain or retain business or to improperly influence the act or decision of any government official, political party, candidate for political office, or official of a public international organization;
  - Gain an improper business advantage; or
  - Illegally influence the action of any individual, customer, company, or company representative.
- ❖ While Cryptera observes local business customs and market practices. Neither Cryptera nor any Supplier shall participate in any corrupt practices.
- ❖ Cryptera can engage only in legitimate business transactions with third parties and its customers, and comply with all applicable laws.
- ❖ Suppliers must follow the laws of the country in which they operate applicable United States laws, and these Standards.

### FAIR COMPETITION AND ANTITRUST

- ❖ Suppliers must comply with all applicable laws and regulation regarding fair competition and antitrust.

### INTELLECTUAL PROPERTY AND CONFIDENTIAL INFORMATION

- ❖ All Suppliers requiring the exchange of confidential information with Cryptera are required to execute a confidentiality agreement with Cryptera in advance.
- ❖ Exchange of confidential information is limited to that required to fulfill contracted performance requirements.
- ❖ Suppliers shall not share Cryptera's intellectual property or confidential information or any other information that they may acquire with respect to Cryptera's business (including information developed by Suppliers and information relating to products, customers, pricing, costs, know-how, strategies, programs, processes, and practices).
- ❖ Immediately report unauthorized disclosure of Cryptera's confidential information, whether inadvertent or not, through Cryptera EthicsPoint hotline at:  
<https://secure.ethicspoint.com/domain/media/en/gui/2013/index.html> .

### DATA PRIVACY

- ❖ Supplier must abide by applicable data privacy laws and regulations when handling personal information.
- ❖ Immediately report unauthorized use, disclosure, or loss of personal information through Cryptera EthicsPoint at:  
<https://secure.ethicspoint.com/domain/media/en/gui/2013/index.html> .

### EMPLOYMENT PRACTICES GUIDELINES

- ❖ Suppliers must treat Cryptera employees with dignity and respect.
- ❖ Suppliers must comply with all applicable Employment laws and regulations including statutes prohibiting discrimination and harassment in the workplace.
- ❖ Suppliers shall not possess, use, distribute or sell illegal drugs on Cryptera property or perform their work under the influence of alcohol or illegal drugs.
- ❖ Suppliers must demonstrate their respect for human rights by, among other things, abiding by all rules and regulations governing human trafficking, forced and child labor and conflict minerals.
- ❖ Cryptera does not permit intimidation or hostility and will not tolerate any behavior from a supplier that might harass, disrupt or interfere with another person's ability to work.

### CONFLICTS OF INTEREST

- ❖ A conflict of interest arises when personal interests or activities conflict with, or appear to conflict with, the best interests of Cryptera as an organization. Some situations where a conflict of interest may exist:
- ❖ Holding a financial interest in a company that compete, does business, or seeks to do business with Cryptera.
- ❖ Providing similar services for direct competitors of Cryptera, with access to confidential or competitive information.
- ❖ When family members (or romantic partners, or those personally close to you) work for Cryptera, another Cryptera supplier, Cryptera customer or Cryptera competitor.
- ❖ Providing excessive gifts, entertainment, or other benefits to Cryptera's employees that could appear to exert improper influence or be linked to the award of a business.
- ❖ Suppliers must disclose any apparent or actual conflicts of interest to Cryptera's management. If Cryptera management approves an apparent or actual conflict, the approval decision must be documented.

**TRADE COMPLIANCE**

- ❖ Suppliers must comply with the letter and spirit of all applicable import and export controls and trade compliance laws of the United States and of the host country where Cryptera does business.
- ❖ Cryptera and its subsidiaries are required to report any bid requests, purchase orders, contracts, letter of credit, shipping documents or other communications to cooperate with unsanctioned boycotts.

**GIFTS & ENTERTAINMENT**

- ❖ Gifts and entertainment are not needed in order to conduct business with Cryptera and are highly discouraged.
- ❖ The following situations are always inappropriate and are expressly prohibited:
  - Giving a gift, entertainment, or preferred treatment with the intention of trying to influence the decision-making objectivity of a Cryptera employee.
  - Offering any gift, entertainment, or preferred treatment while involved in a current purchasing or contracting decision process (RFI, RFQ, and RFP).
  - Any gift in the form of cash, including gift cards or certificates.
  - Offering entertainment where the Supplier will not be present/represented (e.g., sports/event tickets).
  - Offering extravagant recreational outings travel, or lodgings at supplier sponsored events.
- ❖ On a rare and infrequent basis Cryptera employees may accept very modest gifts, entertainment, or other business courtesies if it helps improve the business relationship and they would be able to reciprocate in equal value.
- ❖ Cryptera employees are not permitted to solicit suppliers for gifts including gifts to support charitable causes.
- ❖ Suppliers shall not offer an opportunity to purchase products, services, or a financial interest to any Cryptera employees under terms not available to all Cryptera employees.

**ACCURACY OF BUSINESS RECORDS**

- ❖ Suppliers are required to maintain accurate books and records that reflect actual transactions and payments consistent with Cryptera's system of internal accounting controls.
- ❖ All financial books and records must conform to generally accepted accounting principles.
- ❖ Supplier records must be accurate in all material respects.
- ❖ Records must be legible, transparent, and reflect actual transactions and payments.
- ❖ Do not hide, fail to record, or make false entries.

**ENVIRONMENT, HEALTH & SAFETY**

- ❖ Suppliers are expected to comply with all applicable laws and regulation regarding environment, health and safety.
- ❖ Suppliers working with Cryptera or onsite at a Cryptera location must work in a way that assures their own safety and the safety of others and in compliance with applicable Cryptera and governmental environmental, health and safety requirements. Any emergencies must be reported promptly.

**CRYPTERA RESOURCES**

- ❖ If you need additional information or guidance on these standards or wish to report a potential violation, contact Cryptera EthicsPoint hotline at:  
<https://secure.ethicspoint.com/domain/media/en/gui/2013/index.html>

Additional information can be found at:  
<http://www.cryptera.com>