

PAE

The Ethics and Compliance
Code of Conduct

LEADING THE WAY



Published by the Office of Ethics & Compliance

PAE

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The most current version of this document is available online via the One PAE Policy Library and on the investor relations section of PAE's corporate website.

The PAE Policy Statements (PAEs) identified in this Code are included only as references for Personnel and are subject to change or elimination at the discretion of PAE.

Any such change or elimination will not change this Code. The current versions of all policy statements are available to employees on the One PAE Policy Library.

Dear PAE Colleague,

PAE's legacy of high standards for ethics and compliance in our business operations stems from our founding in 1955. We know that a dedication to both ethics and performance is critical to our success. We have distinguished ourselves with a reputation of integrity and excellence, paired with our mission of providing safety, security and stability throughout the world, no matter the challenge.

Shaped by PAE Values, our Ethics and Compliance Code of Conduct, *Leading the Way*, guides employees through the key policies, laws and regulations that define ethical behavior at PAE across a range of topics. The Code is the basis of our annual ethics and compliance training and is designed to accommodate the diverse settings where PAE operates. Every employee is expected to understand and comply with all topics addressed in the Code, as well as all underlying PAE policies that flow down from the Code.

We foster an environment that encourages honest and fair relationships with customers, colleagues, partners, suppliers, subcontractors, shareholders and the communities where we live and work. As employees, it is your responsibility to perform your job with the highest standard of ethics. PAE's ethics program, human resources professionals and your managers are available to address issues, answer questions, confirm a course of action and allow you to voice concerns. Please use your resources and speak up if you suspect or become aware of any misconduct.

I am proud to lead PAE in maintaining our culture of ethical business practices that is so vital to our business. Thank you for your hard work and commitment to leading the way with integrity and excellence.

Sincerely,



Charlie Peiffer
Interim President and CEO



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ABOUT THE OFFICE OF ETHICS & COMPLIANCE

PAE established the Office of Ethics & Compliance to implement and strengthen our commitment to ethical conduct throughout our business.

PAE holds each individual accountable for upholding our Vision, our Values and our Code. In so doing, we ensure that PAE's business is consistently conducted with the high ethical standards that we demand from each other and that others have the right to demand from us.

The Chief Ethics & Compliance Officer reports directly to the Executive Vice President & General Counsel and oversees a vigorous Company-wide effort to promote a positive, inclusive and ethical work environment for all Personnel.

The Office of Ethics & Compliance operates a confidential Ethics Hotline in partnership with a third party provider, Lighthouse Services.

If your concern relates to the actions or decisions of the Chief Ethics & Compliance Officer, please contact the Executive Vice President & General Counsel.

Our Principles

Our success depends on maintaining a culture of integrity. PAE is committed to dealing honestly and fairly with our Personnel, customers, suppliers, shareholders and the communities in which we live and work.

Leading with Integrity and Excellence

ETHICS PROCESS OVERVIEW

How does Ethics relate to business conduct at PAE?

At PAE, we aspire to do more than meet the requirements of applicable laws and regulations. We strive to do what is right. As former United States Supreme Court Justice Potter Stewart said:

“Ethics is knowing the difference between what you have a right to do, and what is the right thing to do.”

Our commitment to Ethics is articulated in our **Corporate Vision**, which is:

PAE is a global leader in providing enduring support for the essential missions of the U.S. government, its allied partners and international organizations.

We will accomplish our **Vision** by conducting business in accordance with our **Corporate Values**, which are:

- Be Customer-Focused
- Be Innovative
- Be Safe
- Be Your Best
- Champion Diversity
- Demonstrate Discipline
- Have Integrity
- Work Smart

The Office of Ethics & Compliance supports high ethical standards at PAE by serving as a third-party, independent resource for information, advice and resolution of problems and issues.

To equip Personnel with the tools needed to address ethical issues in the workplace, PAE educates its Personnel on its Corporate Vision and Values and conducts annual ethics and compliance training for all employees.

To whom does the code apply?

The Code applies to and is mandated for all employees, Board Directors of PAE Incorporated, and Executive Officers¹ (collectively, “Personnel”), including its wholly or majority owned affiliates, subsidiaries and joint ventures as described in PAE Policy Statement PAE-901, Section 2.3. Joint ventures and other affiliates in which PAE is the majority shareholder shall follow this policy unless an exception has been approved by the policy proponent. Personnel who manage PAE’s interests in other PAE affiliates, including joint ventures, in which PAE is not the majority shareholder, shall work to ensure that the entity adopts a policy that is substantially similar to this policy. Any waiver of this Code of Conduct for Executive Officers or Board Directors must be approved by the Board of Directors of PAE Incorporated (the “Board”). Any such waivers, including the reasons for such waivers, shall be publicly disclosed within four business days by filing a current report on Form 8-K with the Securities and Exchange Commission, providing website disclosure in accordance with the requirements of Form 8-K, or in cases where a Form 8-K is not required, by distributing a press release. We are committed to ensuring that waivers are not granted except when they are truly necessary and warranted.

All Personnel are responsible for adhering to the standards of conduct set forth in this Code and for raising questions if you are concerned that these standards are not being met. All of us, wherever we work, must behave in accordance with these standards when dealing with coworkers, customers, suppliers, contractors, stakeholders and competitors. When appropriate, businesses should provide a copy of PAE’s Third Party Code of Conduct to comply with our standards and principles.

Violations of the Code are cause for corrective action, which may result in disciplinary action up to and including termination of employment.

¹ “Executive Officer” means those officers covered in Rule 16a-1(f) under the Securities Exchange Act of 1934, including, without limitation, the principal executive officer, principal financial officer, principal accounting officer or controller, or persons performing similar functions.

What information will I be asked to provide when I call the Ethics Hotline to report observed misconduct?

To facilitate a thorough investigation, it is necessary to know the location where the alleged misconduct occurred and other pertinent details. Specifically, information concerning the who, what, where, when and how of the concern is beneficial.

Although it is not a requirement, we encourage callers who use the Ethics Hotline to provide their name and contact information for follow-up questions, if necessary. This information also enables us to provide a caller with the results of an investigation, if appropriate.

Can I remain anonymous and still keep track of what is happening throughout an ethics investigation initiated by my contact?

Yes. You may anonymously inquire on the status or outcome of an ethics investigation initiated by your call.

How long does it take to complete an ethics investigation?

Depending on the nature of the case, an investigation may span over a few days or several months. The average time to close an ethics case is 30 days.

How often are ethics cases substantiated? What happens to the cases that are not substantiated?

Not all cases handled by the Office of Ethics & Compliance are substantiated. Cases are typically closed without substantiation because the facts obtained during the investigation did not support the allegations or because sufficient information was not available to determine if the allegation was true.

What typically happens as a result of an ethics investigation when the allegation is substantiated?

Action taken as a result of a substantiated ethics case varies depending on the type of case and the severity of the misconduct. Termination of employment, resign/retire in lieu of termination, suspension, written or oral reprimands, and counseling are among the actions typically taken. Please note that disciplinary actions will not be shared with the party who files a claim. Sanctions are often accompanied by other corrective actions, including training, accounting adjustments, reassignment and reorganization. PAE's commitment to ethics is real.

How can I report violations of this Code?

You have many different channels to report violations or potential violations of this Code, including your manager, your human resources business partner, your facility security officer, the Office of Ethics & Compliance, and the Ethics Hotline as appropriate.

As a general guideline, the first action should be to discuss the situation with your manager. If that is not possible for some reason or if your manager doesn't resolve your concern, it is your responsibility to discuss the situation with a leader within your organization or within another department.

If you have good reason to believe that a violation of the Code or a contract provision has occurred, or if you are asked to violate the Code or a contract provision; speak up! Any known or suspected violations must be promptly reported through the appropriate channels. This includes any concerns that you may have regarding suspected or known violations about the Company's accounting, internal accounting controls, auditing matters, or questionable financial practices. The failure to report a violation may itself violate this Code. Remember that no unethical or illegal acts can be justified by saying that they benefited the Company or that they were directed by a higher authority in the organization. The following are some of the confidential and anonymous ways in which you can contact the Ethics Hotline:

Website

- Available at www.lighthouse-services.com/pae
- Pages are also available for additional languages

- Bengali: www.lighthousegoto.com/pae/ben
- Dari: www.lighthousegoto.com/pae/dar
- Filipino: www.lighthousegoto.com/pae/fil
- French: www.lighthousegoto.com/pae/fre
- Punjabi and Gurmukhi:
www.lighthousegoto.com/pae/pung
- Spanish: www.lighthousegoto.com/pae/spa
- Urdu: www.lighthousegoto.com/pae/urd

Anonymous Reporting App

- [Read detailed instructions](#) on downloading the app and making a report
- Keyword: *pae*

Toll-Free Direct Dial Telephone

- English, United States and Canada: 703-656-7500
- Spanish, United States and Canada: 800-216-1288
- All other countries: 800-603-2869 ([view required access codes and dialing instructions](#))

E-mail

- Available at ethics@pae.com

Fax

- Available at 215-689-3885
- Include company name, PAE, with report

What can I expect when I contact the Ethics Hotline?

- Your concern will be treated seriously and fairly.
- You will be treated with dignity and respect.
- You need not identify yourself.
- Whether you identify yourself or not, your communication will be kept confidential to the greatest extent possible.

- At a later date, you will be informed of the outcome. If you have reported anonymously, you can contact the Ethics Hotline to learn the outcome of the case.
- Due to privacy considerations, you likely will not be informed of the details of any discipline that may result from an investigation into your concerns.
- PAE takes its obligations very seriously and will take appropriate action in response to violations of this Code, even if these actions are not always visible to you.

Remember, there is never a penalty for contacting the Ethics Hotline in good faith. People in a position of authority cannot stop you; if they try, they are subject to disciplinary action up to and including dismissal.

PAE will not tolerate retaliation against Personnel who raise concerns to any source in good faith.

**Who is responsible for
Ethical Conduct?**

WE ALL ARE!

ANTI-RETALIATION

Our Principle

PAE is committed to conducting its affairs honestly, ethically and in compliance with all applicable governmental laws, rules and regulations. The Company is also committed to encouraging the reporting of questionable behavior by protecting and ensuring fair treatment of those who make good faith reports of potential violations of laws, rules, regulations or policies, including this Code. PAE is dedicated to fostering an atmosphere of self-awareness and prudent conduct.

Leading the Way

Personnel must report concerns about PAE-related violations of laws, regulations or PAE policies. A good faith report is one that is made with the honest and reasonable belief that a Company-related violation of law or policy or other instance of non-compliance or related misconduct may have occurred. Attempts to resolve concerns should normally be made by contacting the appropriate manager in the chain of command. If the reporting individual is, for any reason, uncomfortable with this, reports may be made directly to the Chief Ethics & Compliance Officer.

Retaliation, which is defined as materially adverse action against Personnel for making a good faith report of potential Company-related legal, ethics or policy violations, is prohibited and will not be tolerated. If you believe that someone has retaliated against you for reporting a concern or otherwise functioning as a whistleblower, you should bring your concerns to the Office of Ethics & Compliance immediately.

PAE will review complaints of retaliation, and any attempted or actual retaliatory action may subject the violator to disciplinary action.

Practical Example

- Q.** My manager has provided me with feedback on my performance that was quite critical. I feel that this is a form of retaliation because we used to be peers and did not get along. Is this retaliation?
- A.** No. This action on the part of your manager is not related to a concern you have raised.
- Q.** I recently reported to my manager that I have concerns with the charging instructions she provided, and that it may not be proper. She did not receive the feedback well, and the next day she took me off the project. What should I do?
- A.** You should report this matter to the next person in your chain of command. If you are uncomfortable doing so, you may report the matter to your human resources business partner, your facility security officer, or PAE's Ethics Hotline.

Who can I speak with if I have questions?

- The Office of Ethics & Compliance
- The Human Resources Department

PAE Personnel should consult the following policy statements for further information about this topic:

PAE-001 Ethics & Compliance

COMPLY WITH LAWS AND REGULATIONS

Our Principle

PAE is committed to performing with integrity and exceeding our customers' expectations. For this reason, we believe that it is important to comply with both the letter and the spirit of the laws and regulations that govern our business.

Leading the Way

You are expected to perform all of your duties on behalf of PAE in compliance with all applicable governmental laws, rules, regulations and Company policies. This is a minimum expectation. The Legal Department and the Office of Ethics & Compliance are always available to help you understand the laws and regulations that apply to your job. It should be understood, however, that upholding our values and this Code may require more than mere compliance with laws and regulations.

If you perform work internationally, you are also subject to the laws and regulations of the countries in which we do business.

You may find that there is a conflict between the laws of the countries in which we operate and the laws of the United States or Company policy. You are expected to respect and comply with the laws of the countries in which we operate. Personnel are responsible for understanding and following local laws in the places where they work and conduct business. In the cases where the laws may be less restrictive than company standards, Personnel will be expected to follow company standards. Please consult with the Legal Department or the Office of Ethics & Compliance to receive more guidance and direction.

Practical Example

- Q.** Is it permissible to give something of value in exchange for commercial sex acts if I am in a country where it is lawful?
- A.** Our policies and the United States Government regulations are more restrictive, and you would not be allowed to engage in such acts, even if it was lawful in a certain country.

Who can I speak with if I have questions?

- The Legal Department
- The Office of Ethics & Compliance

PAE Personnel should consult the following policy statements for further information about this topic:

PAE-001 Ethics & Compliance

PAE-509 Trafficking in Persons

ZERO TOLERANCE FOR DISCRIMINATION AND HARASSMENT

Our Principle

PAE is committed to providing a safe and respectful work environment free from threats, violence, harassment and discrimination. Respecting others and performing with excellence create opportunities to achieve success in our workplace.

Leading the Way

You are expected to treat all PAE Personnel, suppliers and customers with dignity and respect. PAE's goal is to maintain a professional work environment that is free from threats and acts of violence, bullying, abusive or intimidating conduct or other similar behavior. PAE does not tolerate harassment or discrimination of any kind especially involving race, ethnicity, religion, color, sex, national origin, age, military veteran's status, ancestry, sexual orientation, gender identity or expression, marital status or disability.

As a global enterprise, we recognize that the various countries in which we do business may have different legal provisions pertaining to discrimination and harassment in the workplace. Nonetheless, PAE has set a standard of zero tolerance for discrimination and harassment that applies to all of its Personnel, wherever they work.

If you are a PAE leader, you have a special responsibility for promoting a positive, diverse and inclusive work environment where everyone may raise issues or concerns without fear of retaliation.

Practical Example:

- Q.** I witnessed a team member getting bullied by others on her team. What should I do?
- A.** You can speak directly to the individual or your manager about your concerns. You can also speak to a higher-level manager or raise the issue with HR or the Ethics & Compliance Office.

Who can I speak with if I have questions?

- Your manager
- The Human Resources Manager

PAE Personnel should consult the following policy statements for further information about this topic:

PAE-301 Nondiscrimination - Equal Employment Opportunity
PAE-310 Harassment Free Workplace

MAINTAIN A SAFE AND HEALTHY **WORK ENVIRONMENT**

Our Principle

PAE is committed to providing a drug-free, tobacco-free, safe and healthy work environment. PAE observes environmentally sound business practices throughout the world because it is the right thing to do.

Leading the Way

You are responsible for complying with Environmental, Safety and Health laws and regulations. Observe all posted warnings and regulations. Report immediately to the appropriate management any accident or injury sustained on the job, or any environmental or safety concern you may have.

You may not be under the influence of alcohol or illegal drugs, or abuse legal drugs, in the workplace at any time. PAE prohibits possession, use, sale, manufacture, transfer, trafficking in or being under the influence of illegal drugs, or the abusive use of legal drugs, in the workplace or in the performance of company business.

Practical Example:

- Q.** A colleague had an accident at the work site and does not want it reported. What should he do?
- A.** Encourage your coworker to report it. A failure to do so could put others at risk. If your coworker refuses, talk to your manager and report the matter yourself.
- Q.** You are on a business trip with your coworker, and he invites you to try an illegal drug substance. You decline the invitation and see him use the drug. What should you do?
- A.** You should report the matter to your manager immediately. Non-compliance with our drug-free workplace requirements erodes morale, productivity and can place you and others at risk. It can also result in disciplinary action, including termination of employment.

Who can I speak with if I have questions?

- The Environmental, Safety and Health Department

PAE Personnel should consult the following policy statements for further information about this topic:

PAE-960-999 Environment, Safety and Health

PAE-306 Drug, Alcohol and Tobacco Free Workplace

ACCURATELY CHARGE LABOR **AND OTHER COSTS**

Our Principle

PAE customers place special trust and confidence in us when they award us work. We must honor this trust by ensuring the integrity of our accounting and Company records.

Leading the Way

You and your manager are responsible for understanding and complying with PAE's labor recording policies and procedures. You are also responsible for properly accounting for labor, travel, material and other costs, and ensuring that they are accurately recorded and charged to the Company's records. These costs include, but are not limited to, normal contract work, and bid and proposal activities.

Knowingly mischarging the time that you work or falsifying your time-keeping records violates Company policy and the law. No one shall knowingly charge an incorrect account or cost objective, or knowingly approve such mischarging. Shifting costs to improper accounts also is prohibited.

Transactions between PAE and outside individuals and organizations must be promptly and accurately entered in PAE's books in accordance with generally accepted accounting practices and principles in the United States, and in the countries in which we do business. Under no circumstances should you misrepresent facts or falsify records.

Practical Example:

- Q.** My coworker spends a considerable amount of time browsing through social media websites and charges that time as if she were actually working on an assignment. What should I do?
- A.** We must always manage our time responsibly. Timesheets form the basis of our invoices, which we use to charge the customer, so it is essential that the timesheet be an accurate reflection of the time spent working on the job. Your coworker has potentially committed timesheet fraud, and the issue must be raised with her and her manager.

Who can I speak with if I have questions?

- Your manager
- The Contracts Department
- The Office of Ethics & Compliance
- The Finance Department
- The Internal Audit Department

PAE Personnel should consult the following policy statements for further information about this topic:

PAE-230 Timekeeping and Labor Charging

MAINTAIN ACCURATE BUSINESS RECORDS

Our Principle

PAE's reputation and credibility is dependent on all Personnel maintaining accurate business records. We are committed to operating in an environment of open communication, while not compromising proprietary and confidential information.

Leading the Way

You must ensure the accuracy of any business or financial records for which you are responsible. These include not only financial accounts, but other records such as quality reports, time records, expense reports, resumes and submissions to the Company, the customer or regulatory authorities.

If you are responsible for:

- (1) preparing any disclosure in reports and documents, including, without limitation, business or financial records, that will be filed with, or submitted to, the Securities and Exchange Commission and/or
- (2) making any public communications,

you must ensure that all information contained in such records, documents or communications is full, fair, accurate, timely and understandable.

You should not include any proprietary or confidential business information in any public disclosures without obtaining the proper prior approval. Public disclosures include reports or documents, which you prepare on behalf of PAE, filed with regulatory authorities and other public communications made by PAE.

If you have concerns about any aspect of our business or financial records or auditing matters, you should talk to your manager, the Finance organization, Internal Audit, the Legal Department or the Office of Ethics & Compliance. If you have any concerns about the integrity of the Company's accounting or financial disclosures, books, and/or records, you are obligated to report immediately the suspected or known misconduct.

Practical Example:

- Q.** I have concerns that my colleague is not accurately reviewing and processing the timesheets that are required to issue our invoices to the United States government. What should I do?
- A.** This could potentially create an issue with the False Claims Act, and you should report the matter immediately to your manager and the Chief Ethics & Compliance Officer so that it can be resolved.

Who can I speak with if I have questions?

- Your manager
- The Office of Ethics & Compliance
- The Internal Audit Department
- The Vice President of Marketing & Communications

PAE Personnel should consult the following policy statements for further information about this topic:

PAE-512 Records Management

PAE-202 Internal Control & Total Audit Program

PAE-701 Corporate Communications, Public Affairs and Social Media

RESPONDING TO INVESTIGATIONS

AND LEGAL ACTION

Our Principle

We must pay particular attention to conducting our business and behaving with the highest standards of business ethics. PAE values the trust placed in our Company. We face a significant risk of damaging that trust and our reputation when we are involved in an investigation or litigation.

Leading the Way

PAE Personnel are required to cooperate in internal investigations. You must never destroy or alter any documents or electronic records, lie to or mislead an investigator or obstruct the collection of information relating to an investigation or any legal action brought on behalf of, or against, PAE. Personnel are further requested to respect the confidentiality of the details of an investigation and reveal such specific investigation information only to authorized persons with a need to know.

To the greatest extent possible, PAE shall cooperate with government agencies responsible for investigating suspected violations of law. If requested by PAE, Personnel are required to cooperate with investigations conducted by the government. You must notify the Office of Ethics & Compliance or the Legal Department immediately if you are contacted by a government agency or any third party conducting an investigation or asking for information pertaining to a suspected violation of law. The Office of Ethics & Compliance or Legal Department will help you review information before it is released to the investigative organization.

Practical Example:

- Q.** I overheard my colleagues today at lunch discussing a case that is being investigated. It sounded as if they were talking about confidential information and sharing their responses with one another, as well as with others who were in the room. I think this is wrong, but I don't know what to do.
- A.** Personnel are expected to comply with PAE's Internal Investigation policy. You should advise the Chief Ethics & Compliance Officer.

Who can I speak with if I have questions?

- Your manager
- The Office of Ethics & Compliance
- The Legal Department

PAE Personnel should consult the following policy statements for further information about this topic:

PAE-513 Internal Investigations

PAE-505 Disclosure of Legal Violations

STRICTLY ADHERE TO ALL ANTITRUST LAWS

Our Principle

PAE values open and fair competition. We want to win, but only with integrity. We do not knowingly enter into business arrangements that eliminate or discourage competition, or that provide us with an improper competitive advantage because such arrangements undermine the free marketplace on which our business depends. If you are involved in any dealings with competitors, you are expected to know that antitrust laws may apply to your activities, and that you are required to consult with the Office of Ethics & Compliance or the Legal Department before negotiating with or entering into any arrangement with a competitor. In addition, you should be aware that any of the following may violate antitrust laws:

- Price fixing;
- Boycotting suppliers or customers;
- Pricing intended to run a competitor out of business;
- Bribery, kickbacks or stealing trade secrets;
- Entering into agreements or understandings with competitors to divide the market in which they compete by allocating territories or markets, and/or limiting the production or sale of products or product lines;
- Conditioning the sale of one product/service on the sale of another unwanted product/service; and/or
- Conditioning the sale or purchase of products/services on the requirement that the seller or purchaser not do business with competitors of the Company.

Leading the Way

You must avoid engaging in or discussing any of the above activities with competitors, suppliers or customers, and you must report any instances in which such activities are proposed or discussed to the Office of Ethics & Compliance or the Legal Department.

Practical Example:

- Q.** I received a call from a company that wants to supply products to us. They asked for the pricing information of the other vendors to see if their prices are in the same range. What should I do?
- A.** Do not provide that information. We have an ethical and contractual obligation to respect the confidentiality of vendors' pricing information. Sharing this information is unethical and could be perceived as price fixing.

Who can I speak with if I have questions?

- Your manager
- The Legal Department
- The Contracts Department
- Your Business Development partner
- The Office of Ethics & Compliance

PAE Personnel should consult the following policy statements for further information about this topic:

Code of Conduct

PAE-725 Anti-Trust Acts - Teaming Agreements

DO BUSINESS ETHICALLY OUTSIDE **THE UNITED STATES**

Our Principle

PAE's commitment to the highest standards of ethical conduct applies to all Personnel in every location. Bribery, violations of export and import laws, and participating in illegal boycotts erode confidence in the marketplace, undermine democracy, distort economic and social development and hurt everyone who depends on trust and transparency in the transaction of business.

Leading the Way

Unless prohibited by United States law, you are responsible for complying with the national and local laws of the countries in which we operate. In the case of a conflict with United States law, you must obtain direction from the Legal Department or the Office of Ethics & Compliance. In particular, you must pay special attention to the following laws:

Anti-corruption:

The United States Foreign Corrupt Practices Act

You must strictly comply with the anti-corruption laws that govern our operations in the countries where we do business. Such laws include the United States Foreign Corrupt Practices Act (FCPA) and similar laws enacted by other countries, and international anti-bribery conventions; for example, the Organization of Economic Cooperation and Development (OECD) Convention on Combating Bribery of Foreign Officials. Generally, these laws prohibit the bribery, direct or indirect, of foreign government officials, political parties or candidates to obtain some improper business advantage. More specifically, they prohibit you, directly or indirectly, from giving, offering or promising anything of value to foreign officials or foreign political parties or candidates for the purpose of influencing them to misuse their official capacity to obtain, keep or direct business, or to gain any improper advantage. In addition, to prevent the concealment of bribery, the FCPA prohibits knowingly falsifying a Company's books and records or knowingly circumventing or failing to implement adequate internal accounting controls.

Prohibitions on Kickbacks:

PAE Personnel are prohibited from providing or attempting to provide a kickback, soliciting or attempting to accept a kickback. A kickback is defined as any money, fee, commission, credit, gift, gratuity, thing of value or compensation of any kind which is provided, directly or indirectly, to any prime contractor employee or subcontractor employee for the purpose of improperly obtaining or rewarding favorable treatment.

Export/Import and Other Trade Restrictions:

You are required to strictly comply with all export and import laws and regulations that govern the transfer of certain technical data, equipment and technology between countries. The export licensing and controls that govern such transfers, as well as the rules pertaining to the import of goods and services, are complex. You must be careful to avoid even inadvertent violations.

In addition, you may not obligate PAE to engage in trade in any country subject to trade restrictions imposed by the United States government. Such restrictions can include sanctions or embargoes that prohibit PAE from engaging in certain business activities in specified countries and with specified individuals and entities. For example, United States law prohibits interaction with identified terrorist states and organizations.

To ensure compliance with these laws, sanctions and embargoes, you are responsible for consulting with Company experts in the International Trade Compliance Office (ITCO), the Office of Ethics & Compliance or the Legal Department before negotiating any foreign transaction.

Antiboycott:

You may not support restrictive international trade practices or boycotts not sanctioned by the United States government. All requests to engage in any such activity must be immediately reported to the Legal Department or the Office of Ethics & Compliance.

Practical Example:

- Q.** My manager advised that all we have to worry about is the FCPA and making sure we fit within its definitions and allowed actions. Is this true?
- A.** Not exactly. Even if an action is permissible under the FCPA, it could be a criminal act in the country in which it occurred or under an international convention. For example, the UK Bribery Act is considerably more restrictive than the FCPA. PAE and its Personnel must comply not only with the laws of the United States but also the laws of the countries in which we operate.
- Q.** There is an immediate need to ship laptops and other IT equipment to a site located overseas, and I have been asked to ship them today. Is it okay to ship them without getting approval from the ITCO?
- A.** No. Request guidance from the ITCO. They will advise you if the items you are trying to ship require an export license. Shipping items without the appropriate export authorization could result in a violation of the international transaction regulations, which could result in heavy fines and penalties and potential debarments from conducting procurements with the United States government.

- Q.** My colleague has been receiving fancy electronic devices from a vendor who has been awarded task orders from the Company. I am concerned that this is a potential kickback situation. What should I do?
- A.** Report the situation to your manager, the Chief Ethics & Compliance Officer and the Legal Department immediately.
- Q.** I received a request for proposal that asks the Company to confirm that we do not do business with a certain country. What should I do?
- A.** Consult with the Legal department immediately and seek guidance before proceeding.

Who can I speak with if I have questions?

- Your manager
- The Legal Department
- The Office of Ethics & Compliance
- The International Trade Compliance Department

PAE Personnel should consult the following policy statements for further information about this topic:

PAE-508 Anti-Bribery Compliance

PAE-800 International Trade Controls and Compliance

PAE-506 Convicted Debarred or Suspended Persons or Firms

PAE-507 Compliance with United States Anti-boycott Laws

PAE-502 International Consultants

PAE-790 Anti-Kickback Act

POLITICAL CONTRIBUTIONS AND ACTIVITIES, **INCLUDING LOBBYING**

Our Principle

PAE respects the integrity of the political process and is committed to upholding the spirit and letter of all laws relating to participation in the political process.

Leading the Way

Many countries, including the United States, prohibit PAE from donating corporate funds, goods or services, directly or indirectly, to political candidates. This prohibition includes Personnel's work time. Local and state laws also govern PAE's political contributions and activities. Because the laws in this area are complex, you must obtain the written approval of the Legal Department or the Office of Ethics & Compliance before using any PAE funds, assets or facilities (including your work time) for the benefit of political parties or candidates anywhere in the world.

You are encouraged to personally participate in civic affairs and the political process, as well as support the political parties and candidates of your choice. Your involvement and participation in the political process must be on an individual basis, on your own time, and at your own expense. You must be aware of, and avoid, conflicts of interest that can arise if you campaign for or hold public office or serve on commissions or advisory groups. If you plan to seek or accept a public office, you must consult with the Legal Department.

If you engage in such activity, you may be engaged in lobbying. Always ask before you act to avoid unintentional violations of corporate policy and federal rules concerning gifts and lobbying.

You must also know and follow corporate policies and procedures before contacting any member or employee of a non-United States government.

It is important that PAE present a single, consistent business message to our Washington, D.C.-based customer community. You must coordinate with the vice president of Marketing & Communications before interacting with United States Congressional and senior Executive Branch employees and staff as a representative of PAE.

Practical Example:

- Q.** What should I do if I receive an invitation to attend a political event because of my work at PAE?
- A.** It's best to speak with your manager and the Office of Ethics & Compliance to determine the scope of the invitation.

Who can I speak with if I have questions?

- Your manager
- The Office of Ethics & Compliance
- The Legal Department
- The Marketing & Communications Department

PAE Personnel should consult the following policy statements for further information about this topic:

PAE-701 Corporate Communications, Public Affairs and Social Media

COMPETE FAIRLY FOR ALL BUSINESS OPPORTUNITIES

Our Principle

The integrity of the procurement process in bidding, negotiating and performing contracts for local, state, national and international customers plays a significant role in the Company's long-term success. We compete fairly and ethically for all business opportunities.

Leading the Way

You are responsible for dealing fairly with the Company's customers, suppliers, competitors and Personnel. If you are involved in proposals, bid preparations or contract negotiations, you must be certain that all statements, communications and representations to prospective customers and suppliers are accurate and truthful. Once awarded, all contracts must be performed in compliance with specifications, requirements and clauses.

If you are offered any unauthorized contractor bid and proposal information or source selection information, you must refuse the offer and immediately report it to the Legal Department or the Office of Ethics & Compliance. You may not use, obtain, accept, offer, or receive any information to which PAE is not clearly and legitimately entitled. If you ever have reason to believe that the release or receipt of any information is unauthorized, or if you are uncertain as to PAE's legal right to use the information, do not copy, distribute or use the information until you have obtained guidance from the Legal Department or the Office of Ethics & Compliance.

Practical Example:

- Q.** I am a member of the Business Development team and received our competitor's pricing information in the form of a spreadsheet in my inbox titled "Pricing Information for Recompete." I believe that our competitor sent it to my email by mistake. What should I do?
- A.** Do not open or forward the spreadsheet and advise the Legal Department promptly. The Legal Department will provide you with guidance and direction.

Who can I speak with if I have questions?

- Your manager
- The Legal Department
- The Office of Ethics & Compliance
- The Business Development Department
- The Contracts Department

PAE Personnel should consult the following policy statements for further information about this topic:

PAE-515 Data Protection

PROVIDE AND ACCEPT APPROPRIATE BUSINESS COURTESIES

Our Principle

PAE competes on the merits of its services and does not use the exchange of business courtesies to gain an unfair competitive advantage. The exchange of business courtesies can create the perception that favors were granted in order to influence business judgment.

Leading the Way

PAE Personnel are prohibited from giving or receiving money or anything of value to induce business decisions. Promotional items of nominal value are acceptable and do not require manager approval; however, customary business amenities (i.e., meals and entertainment) may require approval from the Legal Department. It is each individual's responsibility to ensure that business courtesies are not offered or received except as allowed by PAE's policies. This determination must ensure that the offering or receipt is permitted by law and regulation; does not violate the rules and standards of the recipient or the entity they represent; is consistent with reasonable marketplace customs; and will not adversely impact the reputation of or embarrass PAE.

Solicitation of business courtesies is always prohibited. If you have any questions about the propriety of providing or accepting a business courtesy, contact your manager or the Office of Ethics & Compliance for guidance. It is your personal responsibility to ensure that your acceptance or gift of a business courtesy does not create the perception that favors were granted to secure favorable treatment.

Practical Example:

- Q.** Can I accept a sporting event box ticket valued more than \$150 from a vendor?
- A.** No. While the gift can be viewed as fostering goodwill and may not be frequent in nature; the value of the gift is a greater value than our reasonable dollar threshold, which is \$100. Furthermore, you should speak to your manager to verify whether your team is subject to more restrictive rules on receiving gifts.

Who can I speak with if I have questions?

- Your manager
- The Office of Ethics & Compliance

PAE Personnel should consult the following policy statements for further information about this topic:

PAE-002 Gift, Gratuities and Other Business Courtesies

AVOID HUMAN TRAFFICKING

Our Principle

Human Trafficking is a violation of human rights and refers to the forcing, coercion or defrauding of people, though sexual, physical, and/or psychological violence. PAE has a zero-tolerance policy regarding trafficking in persons, and all PAE employees, subcontractors and subcontractor employees are expected to strictly adhere to this policy. Under this policy, which is derived from Federal Acquisition Regulation (FAR) 52.222-50, contractors and contractor employees may not:

- (1) Engage in severe forms of trafficking in persons, which are generally defined to include any conduct that involves sex trafficking or involuntary servitude;
- (2) Procure commercial sex acts, which are defined as any sexual activity for which anything of value is given to or received by any person; or
- (3) Use forced labor in the performance of a government contract. Forced labor generally includes any circumstances where labor or services are obtained from a person using acts or threats of serious harm, physical restraint, or abuse of law or the legal process.

Leading the Way

PAE Personnel must strictly adhere to the policies and procedures set forth in PAE's Anti-Human Trafficking policy and report any actual or suspected violations of this policy to their manager and our Chief Ethics & Compliance Officer. PAE employees shall avoid any situation where their actions could create the appearance of human trafficking.

PAE Personnel are expected to seek guidance from their manager and the Chief Ethics & Compliance Officer whenever questions arise regarding this policy and must promptly report any actual or suspected violations of this policy.

Practical Example:

- Q.** What should I do if I hear that my coworker has procured sexual services while on leave?
- A.** Report it. Obtaining commercial sexual services is a crime and a disclosable event. If, at any time during the performance of a government contract, PAE receives information that a PAE employee, subcontractor or subcontractor employee has engaged in conduct that violates this policy, PAE must promptly notify the government's contracting officer of the allegation and any disciplinary actions taken against the suspected wrongdoers. Disciplinary actions will be taken against Personnel who violate this zero tolerance policy (including their failure to report an actual or suspected violation of the policy).
- Q.** I have seen an employee who appears to be underage. I heard that he is just 14 years old. Is there anything I should do?
- A.** You should notify Human Resources and the Chief Ethics & Compliance Officer immediately! Child labor is a violation of the human trafficking

regulations.

- Q.** You overhear one of our subcontractor's saying that he doesn't know how he can survive with his salary. When you ask him what his concern is, he tells you that he was promised \$800 per month by the recruiter, but when he arrived at the work site, the subcontractor told him he was only going to make \$300 per month, "take it or leave it." He also explained that he cannot "leave it" because his recruiter charged him \$5,000 to get the job, and he can barely send enough money home to pay the loan.
- A.** The situation has indicators of conduct that may violate the human trafficking regulations and should be reported to the Chief Ethics & Compliance Officer.
- Q.** True or False? Holding onto employees' passports for safekeeping upon request is an acceptable practice.
- A.** True. The company may retain the worker's passport if requested to do so by the worker for safekeeping but must make it available upon the worker's request.

Who can I speak with if I have questions?

- Your manager
- The Office of Ethics and Compliance
- The Legal Department

PAE Personnel should consult the following policy statements for further information about this topic:

PAE-509 Trafficking in Persons

AVOID PERSONAL CONFLICTS OF INTEREST

Our Principle

PAE is committed to upholding the highest standards of honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships, and expects the same of its Personnel and agents. We all have a responsibility to our customers, owners and partners to act in the best interests of PAE.

Leading the Way

A conflict of interest exists when you have divided loyalties, such that your other duties, responsibilities or obligations run counter to your duty to the Company; or when you have a direct or indirect personal interest in a transaction or matter, such that it might reasonably appear to affect the judgment that you exercise on behalf of PAE, influence your actions or lead you to neglect PAE business interests.

Personnel are responsible for acting in a fair and impartial manner in all business dealings and placing the interests of PAE over personal interests in matters relating to PAE business.

You must avoid financial, business or other transactions or situations in which your personal interests might conflict with, or appear to conflict with, the interests of PAE. Such situations may arise from relationships with customers, competitors, suppliers, present or prospective Personnel, or from the acquisition or use of Company assets for personal gain. An actual conflict of interest does not need to be present to constitute a violation of this Code; you must also avoid activities that create the appearance of a conflict of interest.

A conflict of interest may exist when you use your contacts or position in the Company to advance interests other than the Company's; such as your own private business or financial affairs, or those of a friend or relative (whether or not at the expense of the Company). You should never use Company property or information for personal gain or take for yourself personally any opportunity that is discovered through your position at PAE.

Employees and Executive Officers must disclose in writing any situation, transaction or relationship that might give rise to an actual or potential conflict of interest to their manager, who will review the disclosure with the Legal Department. Board Members shall submit such disclosures directly to the Legal Department.

Practical Example:

Q. I notice that my procurement manager has been awarding contracts to a particular vendor on a frequent basis and has been going out to lunch with this vendor on a daily basis. This doesn't appear to be proper. What should I do?

A. You should discuss the matter with your manager. If you feel

uncomfortable addressing this issue with your manager, bring it to your next level of command.

Q. My coworker has told me that she has gone out on many dates with our manager. Many of our coworkers have noticed this relationship developing and feel that she has unfairly received opportunities because of her relationship with our manager. What should I do?

A. All Personnel need to avoid any situations that create a real or perceived conflict of interest. A personal relationship between a manager and subordinate creates a conflict of interest, and either the manager or subordinate employee would need to be moved to another position. You can speak directly to your coworker or your manager about your concerns, talk to a higher-level manager, or raise the issue with Human Resources or the Ethics & Compliance Office.

Who can I speak with if I have questions?

- Your Manager
- The Human Resources Department
- The Legal Department
- The Office of Ethics & Compliance

PAE Personnel should consult the following policy statement for further information about this topic:

PAE-504 Conflict of Interest

PAE-518 Related Person Transactions Policy

AVOID CONFLICTS OF INTEREST WHEN HIRING AND WORKING WITH FORMER GOVERNMENT EMPLOYEES

Our Principle

For PAE to continue to compete fairly in the marketplace, we must ensure that the Company does not hire or work with former government employees in any manner that creates a real or perceived conflict of interest. We compete fairly and ethically for all business opportunities.

Leading the Way

You are responsible for avoiding conflicts of interest when employing or acquiring the services of current or former government employees.

You must comply fully with all laws and regulations that pertain to employing or acquiring the services of government employees. These rules apply to making contact or negotiations with current government employees to discuss their potential employment by the Company or their potential service as consultants or subcontractors. These rules may also restrict the roles and responsibilities that former government employees perform on our behalf after joining the Company.

The laws and regulations governing the hiring and employment of former government employees can be difficult to follow. When in doubt, you should consult the PAE policy on Employing or Acquiring the Services of Current or Former Military Personnel and Government Employees and seek the advice of your manager, Human Resources, the Office of Ethics & Compliance or Legal Department.

Practical Example:

- Q.** My neighbor, who works as a diplomatic advisor, asked if I could get him an interview at PAE. What should I do?
- A.** You should advise him that you would not be involved in nor have any influence on his hiring, as it would be a conflict of interest. However, you may direct him to apply to the relevant department of the Company.

Who can I speak with if I have questions?

- The Human Resources Department
- The Legal Department

PAE Personnel should consult the following policy statement for further information about this topic:

PAE-305 Employing/Acquiring Services of Current/Former Military/Government/Implementing Agency, International Non-Governmental Organization Personnel

PROPERLY ENGAGE CONSULTANTS, REPRESENTATIVES AND OTHER THIRD PARTIES

Our Principle

Business integrity and commitment to obeying the law are key considerations in the selection and retention of those who represent PAE. PAE recognizes the critical role our partners and suppliers play in maintaining our reputation and ability to do business worldwide. Accordingly, we expect third parties with whom we do business to adhere to the ethics and compliance standards set forth in PAE's Third Party Code of Conduct.

Leading the Way

You must not retain a consultant, subcontract or representative, or another third party to conduct business in a manner that is contrary to PAE's policies or procedures or to circumvent our values and principles. For example, you must not retain consultants, representatives or other third parties for the purpose of paying bribes or kickbacks, engaging in industrial espionage, obtaining the proprietary data of a third party without authority, or improperly gaining inside information or influence.

You are responsible for seeking advice from the Legal Department prior to retaining an international consultant. Consultants and representatives must certify their willingness to comply with this Code, PAE's policies and procedures, and all applicable laws and regulations.

Practical Example:

- Q.** I noticed that our subcontractor's annex manager consistently yells at the annex employees and insults them by using racial slurs. This has created a very unpleasant working environment for our teammates and for us. What should I do?
- A.** You should discuss the matter with your manager or your next level of command. Our subcontractors are required to comply with PAE's Third Party Code of Conduct.

Who can I speak with if I have questions?

- Your manager
- The Legal Department
- Global Supply Chain Management

PAE Personnel should consult the following policy statements for further information about this topic:

PAE-502 International Consultants
PAE-748 Consultant Agreements

PROTECT SENSITIVE INFORMATION

Our Principle

PAE Personnel, contractors, agents, consultants, customers and business partners regularly trust the Company with information. We generate sensitive information in our day-to-day work, and we regularly receive sensitive information from our customers, suppliers and others.

Leading the Way

You may not disclose or receive sensitive business information, including proprietary Company information, without proper authorization. You must keep sensitive information, including any proprietary documents such as trade secrets, bid and proposal information, technical information, marketing information, etc., protected and secure. You may only disclose sensitive business information if you have the proper authorization to do so.

In the course of normal business activities, suppliers, customers and competitors may sometimes divulge information to you that is proprietary to their business. You may only accept or use the proprietary information of a supplier, customer or competitor if such use or acceptance complies with Company policy. If you receive proprietary information from a supplier, customer or competitor without proper authorization, such as a non-disclosure agreement, you must immediately bring this to the attention of the Legal Department or the Office of Ethics & Compliance.

Practical Example:

- Q.** PAE hired a former employee to act as a consultant for a recompetete effort. Should we limit his access to information solely associated with the recompetete?
- A.** Yes. You should contact the Human Resources department to draft the scope of his work and coordinate with IT to ensure that his access is limited to information solely for the recompetete.

Who can I speak with if I have questions?

- Your manager
- The Legal Department
- The IT Department
- The Office of Ethics & Compliance

PAE Personnel should consult the following policy statement for further information about this topic:

PAE-515 Data Protection

PROTECT PERSONAL INFORMATION

Our Principle

PAE Personnel, contractors, agents, consultants, customers, business partners and members of the Board of Directors entrust personal information to us, such as home address, social security information and medical information. To sustain a culture of trust, we must protect this sensitive data and use it only for authorized purposes.

Leading the Way

You must not access personal information unless you have a need to know for legitimate business purposes and have prior authorization. If you have access to personal information (including employee or medical records), you may not disclose such information without proper authorization. You must keep personal information protected and secure in accordance with all corporate policies, laws and applicable third-party agreements. You must never use personal information for any purpose for which it was not intended or for personal gain.

If you collect or access personal information on behalf of PAE, you are responsible for knowing and complying with all applicable laws and policies that govern such activities.

If you become aware or believe that personal information has been accessed by an unauthorized person, disclosed inappropriately, used for purposes other than PAE business, or gathered in violation of Company policy or the law, you must immediately bring this to the attention of the Legal Department or the Office of Ethics & Compliance.

Practical Example:

- Q.** I overheard a colleague sharing another employee's salary information with others who did not have a need to know. I think this is wrong. What should I do?
- A.** Report the incident to your manager or the Chief Ethics & Compliance Officer right away.

Who can I speak with if I have questions?

- Your manager
- The Corporate Information Security Team
- The Legal Department
- The Human Resources Department
- The Office of Ethics & Compliance

PAE Personnel should consult the following policy statement for further information about this topic:

PAE-514 Privacy Policy
PAE-515 Data Protection

DO NOT ENGAGE IN INSIDER TRADING

Our Principle

PAE believes in a fair and open market. Accordingly, we comply with the United States securities regulations and laws.

Leading the Way

In the course of your work with PAE, you may learn of non-public and material information about PAE, a vendor, subcontractor, teaming partner, or another third party. Material information means information that a reasonable investor would consider important to their decision to buy or sell stock or other publicly-traded securities. You may not trade on the basis of such information until the information has been widely disseminated to and assimilated by the general public. In addition, you may not disclose the insider information to anyone, including family members, friends, or associates.

Practical Example:

- Q.** I have just learned that PAE lost one of its major contracts. This information has not been communicated to the general public, and I know that this loss will likely cause our stock prices to plummet. Because of this new development, I want to quickly sell my shares of PAE stock before I lose money. Should I proceed with this trade?
- A.** No, you should not. The information about the lost contract has not been made available or disseminated to the general public and is likely to be considered as important information for a reasonable investor to consider in their trading decision. Therefore, until it is widely disseminated to the public, you should not be making trading decisions based on this information.

Who can I speak with if I have questions?

- The Legal Department
- The Investor Relations Team

PAE Personnel should consult the following policy statement for further information about this topic:

PAE-517 Insider Trading Policy

PAE-270 Regulation FD Policy

PROPERLY USE COMPANY AND CUSTOMER ASSETS

Our Principle

PAE's resources and assets do not belong to any of us individually. They belong to the Company and its owners, and we have a responsibility to protect them, acting as stewards of that property. We have the same responsibility to protect all customer resources and assets that are entrusted to PAE.

Leading the Way

You are responsible for the proper use of Company and customer property, electronic communication systems, information resources, materials, facilities and equipment. You must use and maintain these assets with the utmost care and respect, guarding against waste and abuse, and you must never borrow or remove them from Company or customer property without management's permission.

Company assets should only be used to conduct PAE's business. You must seek guidance and permission before using any company asset for personal use. You may not use the Company's resources to support a personal business or for an illegal act or a purpose that would cause embarrassment to PAE.

Use of a Company credit card for personal expenses is strictly prohibited.

Practical Example:

- Q.** I use my Company credit card for personal purchases. Is this a misuse of Company assets even if I pay it back?
- A.** Yes. The Company credit card may only be used for Company purchases.

Who can I speak with if I have questions?

- Your manager
- The Legal Department
- The Office of Ethics & Compliance

PAE Personnel should consult the following policy statements for further information about this topic:

PAE-402 Acceptable Use Policy
PAE-403 Mobile Devices

COMPUTING AND INFORMATION RESOURCES

Our Principle

PAE Personnel shall use Company-issued and Government-issued Information Technology (IT) resources respectfully, responsibly and appropriately in accordance with relevant Company Ethics, Security, Legal and IT policies.

Leading the Way

PAE and government-furnished equipment (GFE) is intended to be used for business operations; however, Personnel are allowed limited personal use in accordance with PAE's policy, provided that the use does not conflict with or interfere with normal business activities. All Personnel are prohibited from using IT equipment in ways that are disruptive, abusive, obscene, degrading or offensive to others. This prohibition includes the transmission of sexually explicit messages, images or cartoons; ethnic slurs; racial comments; or anything that could be construed as harassment/defamation/ slander, or otherwise harming another person or business. Additionally, every effort will be made to follow local laws and to adhere to culturally-sensitive customs. Personnel or other authorized users of PAE or government-provided/managed communications services shall not access the Internet to log onto web sites that contain any prohibited material. Personnel shall not install unauthorized software on Company or government IT assets or copy software and/or its documentation except where there are appropriate license agreements in place. PAE Personnel shall not engage in activity that may compromise the security or the integrity of PAE's proprietary information or copyrights.

Practical Example:

- Q.** Can I use my PAE or government-issued computer to download movies, pornography or music?
- A.** No. This would be considered an inappropriate use of your asset and could result in disciplinary action up to and including dismissal from PAE.
- Q.** Can I install a program that will help me personally or professionally?
- A.** Contact your local IT professional to gain permission. They will advise whether the software can be installed on the asset and whether or not the installation would impact either PAE or GFE networks.

- Q.** Can I install software on my personal computer, which is connected to a PAE or GFE network?
- A.** Any computer connected to a PAE or GFE network has the same possibility/probability to impact the network. Therefore, any personal computer that is to be connected to a PAE or GFE network must be inspected by IT personnel who will ensure there are no applications that could compromise the network and that appropriate security patches and anti-virus software is in place.

Who can I speak with if I have questions?

- Your manager
- The IT Department
- The Site Security Officer
- The Legal Department
- The Office of Ethics & Compliance

PAE Personnel should consult the following policy statement for further information about this topic:

PAE-402 Acceptable Use Policy
PAE-403 Mobile Devices

CORPORATE COMMUNICATIONS, **PUBLIC AFFAIRS AND SOCIAL MEDIA**

Our Principle

PAE is committed to providing accurate, consistent and timely information to its workforce and external audiences, and to building and maintaining a positive corporate reputation through proactive media relations, marketing and philanthropic activities. Many of PAE's customers have policies of their own regarding the public release of information, and all Personnel are expected to abide by these policies by directing all media inquiries to PAE Communications.

Leading the Way

All Personnel are expected to demonstrate respect and professionalism when communicating with other Personnel, customers, teammates, subcontractors and others at work, whether or not they are at a PAE facility. The expectation of professional conduct extends to communications in any format, including but not limited to: verbal conversations, e-mail and personal communications through discussion boards, blogs, social networking sites, etc. While Personnel may express their individual beliefs, they must be clear that these expressions represent a personal view, and they may not imply in any way that their opinion is the view of PAE management.

Should an employee choose to identify PAE as their employer on a social media platform or public website, that employee is considered to be a representative of PAE. Therefore, that employee's comments or posts would be considered within the scope of PAE policy, as they have the potential to reflect on the Company.

Practical Example:

- Q.** I frequently post pictures and talk about work via my Facebook page. Is that not allowed?
- A.** Depending on the nature of your work and the contract you support, you may be limited in what you can post on your social platforms. For instance, if you work at a secure facility, you may be prohibited from certain activities, such as posting pictures of your physical surroundings and describing your daily safety procedures. Also, depending on the contract for your program, you may be prohibited from releasing certain information about your program to the public, via the mainstream media or your personal social media platform. It's always best to check with PAE Communications first, to ensure compliance with PAE and customer policy.

Who can I speak with if I have questions?

- The Vice President of Marketing and Communications

PAE Personnel should consult the following policy statement for further information about this topic:

PAE-402 Acceptable Use Policy

PAE-701 Corporate Communications, Public Affairs and Social Media

PAE-270 Regulation FD Policy

CORPORATE PHILANTHROPY

Our Principle

PAE is committed to maintaining a corporate philanthropy program through which our charitable donations and Personnel volunteer efforts can significantly impact the communities near our program locations and demonstrate our commitment to acting with integrity and social awareness.

Leading the Way

All PAE Personnel are encouraged, but not required, to participate in Company-sponsored events and campaigns that benefit the communities where we live and work. PAE Personnel are always welcome to submit ideas and implementation plans for corporate philanthropy or volunteer initiatives. It is often through the suggestion of Personnel that PAE identifies and pursues a philanthropic initiative, and we are committed to maintaining a philanthropic program that serves those causes which our Personnel consider most important.

Practical Example:

- Q.** I'm personally involved in a charitable cause, outside of my job at PAE. Can I ask my colleagues to join/donate?
- A.** It is natural for Personnel to discuss their personal interests with their colleagues, and PAE does not prohibit its Personnel from mentioning their outside-of-work interests to colleagues. However, Personnel are prohibited from active solicitation through Company equipment or on Company-paid time; or from pressuring colleagues to join or donate to any personal cause or favored organization. Managers should be particularly careful when communicating with their subordinates, to avoid even the perception of pressuring employees to support a certain cause.

Who can I speak with if I have questions?

- The Vice President of Marketing and Communications

PAE Personnel should consult the following policy statement for further information about this topic:

PAE-701 Corporate Communications, Public Affairs and Social Media

PARTICIPATE IN ETHICS & COMPLIANCE TRAINING

Leading the Way

All PAE employees are expected to participate in ethics and compliance training on an annual basis. Completion of this training is a condition of your continued employment with PAE.

PAE Personnel should consult the following policy statement for further information about this topic:

PAE-001 Ethics and Compliance

PAE-407 IT Security Awareness & Training

WARNING SIGNS - YOU MAY BE WITNESSING AN ETHICAL VIOLATION WHEN YOU HEAR...

*"It doesn't matter how it gets done
as long as it gets done."*

"No one will ever know."

"We didn't have this conversation."

"It sounds too good to be true."

"Well, maybe just this once."

"Everybody does it."

"This will destroy the competition."

"This is the way things are done here."

You can probably think of many more phrases that raise warning flags. If you find yourself using or hearing any of these expressions, contact your manager or the Ethics & Compliance Office.

PAE

