

# PARSONS STANDARDS OF ETHICAL CONDUCT FOR BUSINESS PARTNERS

For more than 75 years, Parsons has established a reputation as a professional organization that provides quality service to customers while upholding the highest standards of ethics and integrity. This reputation depends on ethical conduct in all business transactions with our clients and business partners. It is essential that our business partners, who include suppliers, vendors, contractors, consultants, joint venture partners, agents, and other providers of goods and services doing business with us, adhere to these standards.

The Parsons Standards of Ethical Conduct for Business Partners document provides the standards of ethical conduct required of our business partners. The principles in this document are consistent with our core values of safety, quality, integrity, diversity, innovation, and sustainability. Our business partners' values are expected to align with our own.

Complying with the Parsons Standards of Ethical Conduct for Business Partners is a condition of doing business with Parsons. Our business partners are responsible for ensuring their own personnel and supply chain are aware of these standards and for requiring compliance with them. Failure to comply with these standards may jeopardize the business relationship with us.

Our goal is to do the right thing all the time. As we partner, ethical issues may arise. Always make the decision that is consistent with these standards. By doing so, we will advance the reputation of our clients, business partners, and corporation.

**CAREY SMITH**

Chief Executive Officer  
Parsons Corporation

## Compliance with Laws and Regulations



### Compliance With Laws, Regulations, And Contracts

Parsons' business partners are to comply with all applicable laws, regulations, and contract terms. In addition, business partners are to meet all license and registration requirements of applicable jurisdictions.



### Trade Compliance

Parsons and its business partners must ensure the compliant movement across international borders of goods, information, and services. Trade and sanctions restrictions may prevent or limit certain activities in sanctioned countries or with specified entities or individuals. In international business transactions or transactions involving controlled products and/or services, Parsons' business partners are to comply with all applicable export control and trade compliance laws and regulations including, but not limited to, regulations promulgated by the US Departments of State, Commerce, Treasury, Defense, and Energy.



### Anti-Corruption

Parsons conducts all business transactions ethically and in full compliance with all applicable laws, including anticorruption legislation, and abides by all applicable anti-corruption laws (including, but not limited to, the US Foreign Corrupt Practices Act ("FCPA")). Accordingly, Parsons has zero tolerance for bribery or corruption of any kind and we expect the same from our partners. Parsons has a comprehensive Third Party due diligence process to ensure our partners share this view. Business partners must complete any Parsons due diligence questionnaires and processes that are required.



### Confidential Information And Data Privacy

Safeguarding confidential and proprietary information of the client and/or Parsons is an important responsibility. Business partners shall comply with non-disclosure and confidentiality agreements. Intellectual property rights are to be respected and used only in accordance with contractual agreements. There are circumstances when business partners may have access to personal information. Compliance with all applicable privacy laws of is required.

## Ethical Business Practices



### Conflicts Of Interest

Financial, business, or other activities that conflict with any responsibility of Parsons or the client are to be avoided. The same principle applies to situations in which there appears to be a conflict. Business partners are to immediately disclose any real or potential conflict of interest to their point of contact for Parsons' business.



### Accuracy Of Books and Records

Financial books and records are to be kept accurately and in compliance with all applicable legal, regulatory, contractual, and fiscal requirements. Generally accepted accounting practices are to be followed. Records are to be maintained in accordance with legal requirements and contract terms and should be made available for audits, as required.



### Workplace Environment

Laws related to the workplace are to be strictly followed. Employees shall be afforded rights and freedoms consistent with local law. Diversity in the workplace is to be encouraged. Employees are to be provided a work environment that is free from discrimination and harassment, as well as provided safe, secure, and humane working conditions. Employees are to be treated fairly and honestly in all respects, including wages and working hours.



### Human Trafficking

We respect and protect individual human rights and comply with the employment laws in every location in which we do business. All employees are to be provided with safe, secure and humane working conditions and fair wages. Parsons has zero tolerance for forced labor, involuntary servitude, child labor, commercial exploitation, or human trafficking. We expect our subcontractors, suppliers and other business partners to uphold these same standards and will not knowingly do business with those who do not.



### Safety, Health, Environment, And Quality

Business partners are to comply with all applicable health and safety laws, regulations, and safety plans related to a project or site. Care shall be taken to ensure the safety of the communities in which we work and to employ methods to protect the environment. Services provided shall meet applicable quality standards and comply with contract terms and conditions.

## Parsons Resources



### Reporting Violations

Subject to local laws and any legal restrictions, each of Parsons' business partners is expected to promptly report any ethics or integrity concern involving or affecting Parsons, whether or not the concern involves the business partner. The business partner is also expected to take action as reasonably requested by Parsons to assist in the investigation of any ethics or integrity concern that involves Parsons and the business partner. Retaliation for raising an ethics or integrity concern will not be tolerated.

#### **If you have questions or wish to report an ethics or integrity concern, the following channels are available:**

- Contact the Parsons manager you work with.
- Contact the chief ethics and compliance counsel or a member of the Legal Department.
- Contact the Ethics Committee in any of the following ways:
  - **Use the Ethics Helpline website, administered by EthicsPoint:** [www.parsons.ethicspoint.com](http://www.parsons.ethicspoint.com).
  - **Call the Ethics Helpline at the following numbers (see Helpline website for dialing instructions from other countries):**  
Brazil: 0800.8911667  
Canada: 1.888.418.0985  
United States: 1.888.887.9151  
Call collect from any location: 1.503.726.2411
- **Write to the Ethics Committee at:**  
5875 Trinity Parkway, Suite 140  
Centreville, Virginia 20120



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Centreville, Virginia 20120  
Direct: +1 703.988.8500  
[parsons.com](http://parsons.com)

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