



## **PD Systems Inc. Supplier Code of Ethics**

### **Vision, Mission, Goal and Corporate Values**

#### **Vision**

- A respected provider of quality of quality government services and power products;
- Valued by our clients;
- Trusted for our ethical behavior;
- A preferred employer providing an outstanding working environment; and
- Active corporate citizens.

#### **Mission**

To deliver best value services and quality equipment.

#### **Goal**

PD Systems' goal is to provide value for our clients by:

- Developing a strong relationship with them, understanding their requirements and ensuring client satisfaction.
- Providing passionate, trained, committed, technically competent employees.
- Leveraging our Management team to lead, motivate, resolve issues and provide direction.

#### **Corporate Values**

Our values include:

- People: Trained and Responsive
- Agility: Prompt with Quality Solutions
- Integrity: Uncompromising
- Creativity: Innovative Value-Added Solutions
- Competency: Technically Savvy, Professional and Experienced

#### **Quality Policy**

PD Systems is committed to quality solutions, service excellence and client satisfaction. As such, PD Systems is committed to:

**Achieving customer satisfaction by meeting or exceeding contractual requirements and continual improvement of our business process.**

## **Supplier Code of Ethics**

### **Intent**

To promote lawful and ethical behavior by all Suppliers to ensure that the Company's business is conducted according to the values of the Company and all applicable rules, regulations and laws.

### **Application**

This Code of Ethics applies to all Suppliers of the Company.

### **Guidelines**

The Company is committed to conducting its business ethically and with integrity. The ethical conduct of the Company depends on the collective conduct of its Suppliers. The Company has established the PD Systems Ethic Program to coordinate compliance oversight activities company-wide. The Ethics Program establishes processes to assist Suppliers in obtaining guidance and resolving questions regarding ethical and compliance issues. The Company has adopted principles in the following areas to guide Suppliers on behaving with respect, honesty, and decency towards everyone affected by our business:

- Compliance with laws, regulations, rules and policies;
- Appearance of good conduct and avoidance of conflicts of interest;
- Loans and guarantees of obligations;
- Employee relations;
- Harassment;
- Commitment to safety;
- Commitment to excellence;
- Community relations;
- Fair dealing;
- Accurate Company records;
- Confidential Company Information;
- Reporting violations;
- Retaliation; and
- Violations.

Each of these principles is described briefly in the paragraphs that follow.

### **Compliance with Laws, Regulations, Rules and Policies**

Each Supplier is expected to be familiar and comply with the spirit of the law as well as the letter of the law. It is the duty of each Supplier to know, understand, and comply with any laws, regulations, and rules that apply to their employees' job. Violating the law can seriously damage the Company's reputation, subject the Company to liability, and subject the Supplier to personal liability. Questions concerning any legal responsibility should be referred to the Company. Examples of some significant and regulations are:

- Antitrust Laws;
- Environmental Laws and Regulations;
- Nuclear Regulatory Commission Regulations;
- Electric Safety Requirements;
- Pipeline Safety Requirements;
- Employee Health and Safety Laws and Regulations
- Labor and Employment Laws;
- Securities Laws;
- Sarbanes-Oxley Act of 2002;
- Affiliate Transaction and Code of Conduct Regulations;
- ITAR
- Other Governmental Regulator Requirements.

### **Appearance of Good Conduct and Avoidance of Conflicts of Interest**

Each Supplier has a responsibility not only to do the right thing but also to avoid behavior that could be perceived as failing to do the right thing. Suppliers should always act in the best interest of the Company and avoid even the appearance of a conflict of interest. A conflict of interest occurs when a Supplier's private interest interferes in any way with the interests of the Company as a whole. A conflict situation can arise when a Supplier takes actions or has interests that may make it difficult to perform Company work objectively and effectively. Conflicts of interests also arise when a Supplier or its' employees receives improper personal benefits as a result of his or her position. (To obtain additional guidance, employees, and officers should see "Conflict of Interest" policy.

### **Loans and Guarantees of Obligations**

The Company has determined the making of any new guarantees or loans to any employee or their family members is prohibited.

### **Employee Relations**

Each Supplier should promote diversity, inclusiveness, and understanding in the workplace by valuing the individuality and creativity that every employee brings to the Supplier. The Supplier is committed to hiring, placing, and promoting employees on the basis of ability and merit and evaluating employees on a fair and consistent basis.

### **Harassment**

Harassment of any kind seriously undermines the integrity of the employment relationship and respect for human dignity. The Supplier should commit to providing a work environment free from harassment, intimidation, and coercion based on or related to race, sex, religion, national origin, age, disability, sexual orientation, gender preference, or any other classification protected by law. Each supplier has a responsibility to uphold their commitment to provide a workplace free from harassment of any kind.

### **Commitment to Safety**

Each Supplier should ensure their employees perform their job safely at all times, protecting the public, customers, other employees and themselves from injury. It is each Supplier's responsibility to look out for and resolve unsafe situations.

### **Community Relations**

Suppliers should be responsible citizens of local, state, and national communities.

### **Fair Dealing**

Suppliers should endeavor to deal fairly with customers, other suppliers, competitors and employees. None should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair-dealing practice.

### **Accurate Company Records**

It is important that the Supplier maintain accurate and reliable records that meet applicable legal, financial, regulatory and management requirements. Each Supplier has a responsibility to ensure all records, such as accounts, reports, bills, invoices, work and timekeeping records, and correspondence are accurate and maintained in accordance with the applicable document and data retention policies of their applicable business area.

### **Proprietary Company Information**

Proprietary information is any non-public information that – if disclosed- would be damaging to the best interests of the Company or might be of use to competitors. Each Supplier has a responsibility to hold all proprietary information obtained from the Company or its customers in confidence, except when disclosure is authorized or legally mandated. Proprietary information should not be shared with the media, competitors or any other third parties. If there is any doubt about whether such information has been publicly released or if disclosure is legally mandated, the Supplier should contact PD Systems, Inc.

### **Reporting Violations**

If a Supplier knows about or suspects misconduct, illegal activities, fraud, misuse of Company assets or violations of Company policies, the Supplier has a duty to report his/her concerns. Suppliers are encouraged to report any such concerns to the Company. There will be no retribution against any employee making such a report in good faith.

### **Retaliation**

It is a violation of this Code of Ethics for any Supplier to retaliate or discriminate, directly or indirectly, or encourage others to do so, against an individual who reports a suspected violation or provides information relevant to an investigation of any conduct, which the individual reasonably believes to be a violation of applicable laws, regulations or Company policies.

### **Violations**

The Company will investigate any violations or suspected violation of this Code and take appropriate corrective action. Examples of violations include:

- Authorizing or participating in actions which violate applicable laws, regulations or this Code
- Failing to report a violation or willfully withholding relevant and material information concerning a violation. Retaliating against individuals who report or assist in investigations of suspected violations of applicable laws, regulations or this Code