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Parsons' standards of

# ETHICAL CONDUCT

for business partners

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For more than 70 years, Parsons has established a reputation as a professional organization that provides quality service to our customers while upholding the highest standards of ethics and integrity. This reputation depends on ethical conduct in all business transactions with Parsons' clients and its Business Partners. It is essential that Parsons' Business Partners, which includes suppliers, vendors, contractors, consultants, joint venture partners, agents, and other providers of goods and services doing business with Parsons, adhere to these standards.

*Parsons' Standards of Ethical Conduct for Business Partners* states the standards of ethical conduct required of Parsons' Business Partners. The principles in this document are consistent with Parsons' Core Values of Safety, Quality, Integrity, Diversity, Innovation, and Sustainability. It is expected that the values of Parsons' Business Partners are aligned with these values.

Complying with the *Parsons' Standard of Ethical Conduct for Business Partners* is a condition of doing business with Parsons. Parsons Business Partners are responsible to assure their own employees and suppliers are aware of these standards and require compliance with them. Failure to comply with these standards may jeopardize the business relationship with Parsons.

At Parsons, our goal is to do the right thing, all of the time. As we partner, ethical issues may arise. Always make the decision that is consistent with these standards. By doing so, the reputation of our clients, Business Partners, and corporation will be advanced.

**Charles L. Harrington**

Chairman and Chief Executive Officer  
Parsons Corporation

# STANDARDS OF ETHICAL CONDUCT



## COMPLIANCE WITH LAWS, REGULATIONS, AND CONTRACTS

Parsons' Business Partners are to comply with all laws, regulations, and contract terms contained in these standards. In addition, Business Partners are to meet all license and registration requirements of the applicable jurisdictions. Truth and accuracy are essential when dealing with commercial and government clients. Strict adherence to compliance obligations in government contracts is required. In international business transactions, care is to be taken to comply with export control laws.



## ACCURACY OF RECORDS

Financial books and records are to be kept accurate 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.



## ANTI-CORRUPTION

All business is to be conducted fairly. Parsons does not tolerate corruption, bribery, or kickbacks of any kind. Business Partners are to comply with the anti-corruption laws of the various countries and jurisdictions in which they conduct business.



## 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 only used in accordance with contractual agreements. There are circumstances when Business Partners may have access to personal information. This information shall only be used as required for a specific task by those with a need to know. Compliance with privacy laws of various countries is required.

# STANDARDS OF ETHICAL CONDUCT



## CONFLICTS OF INTEREST

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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 the Parsons Business point of contact.



## WORKPLACE ENVIRONMENT

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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 afforded a work environment that is free from discrimination and harassment. Employees are to be provided safe, secure, and humane working conditions. Employees are to be treated fairly and honestly in all respects, including with respect to wages and working hours. Human rights are to be respected. Child labor and any form of forced labor are prohibited.



## SAFETY, HEALTH, ENVIRONMENT, AND QUALITY

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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.

# STANDARDS OF ETHICAL CONDUCT



## REPORTING VIOLATIONS

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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:

- ① Contact the Parsons manager you work with.
- ② Contact the General Counsel or a member of the Legal department.
- ③ 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)

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Call the Ethics Helpline at the following numbers  
(see Helpline website for dialing instructions from other countries):

Brazil: [0800-8911667](tel:0800-8911667)

Canada: [1-888-418-0985](tel:1-888-418-0985)

United States: [1-888-887-9151](tel:1-888-887-9151)

Call collect from any location: [1-503-726-2411](tel:1-503-726-2411)

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Write to the Ethics Committee at:

[100 West Walnut Street](#)  
[Pasadena, CA 91124](#)