

**PARSONS**



**CODE OF CONDUCT**



## A Letter from the Chairman and Chief Executive Officer

I am pleased to introduce our latest Code of Conduct. Represented by our Core Value of Integrity, the ethical manner in which we conduct business and the professional conduct of our employees are cornerstones of Parsons' corporate culture. Today, as our strategic plan leads us to expand our business, ethics and integrity are more important than ever to our success.

We operate in a very different environment than we did even a few years ago. Shareholders and the public in general are holding corporations to a higher standard of social responsibility.

Governments around the world are taking more active roles in fighting corruption and misconduct in both the public and private sectors. Meanwhile, geopolitical and economic forces are creating viable markets in locations that were previously considered too risky. In this environment, the best customers will insist on stable partners with impeccable reputations and proven experience. Parsons is well positioned to be their firm of choice, and we need each and every employee's support to make it happen.

The Standards of Business Conduct, which are contained in the Code, summarize how employees are expected to act when conducting business. These Standards are universally applicable throughout the Company. In addition to providing a clear set of Standards, the Code also provides helpful direction on how to handle some of the most common ethical challenges faced by our employees. I urge you to periodically review the Code and ask questions if you are unsure of meaning or applicability.

In addition to the Code, our ethics program incorporates a variety of tools to assist your efforts. We have a corporate Ethics Committee, Ethics Officers based in all major business units and global regions, an Ethics Home Page on Web, and a third-party administered Ethics Helpline. Each of these resources is available to provide you with advice and assistance if you have any doubts, concerns, or questions about the appropriateness of a particular activity. Do not hesitate to use them.

Parsons has invested more than 70 years establishing our reputation as a professional organization that provides quality service to our customers while upholding the highest levels of ethics and integrity. Throughout the world, our employees have a reputation for conducting themselves with integrity and objectivity. On behalf of our entire Board of Directors, I want to thank each of you for upholding this reputation and urge you to continue building it.

***Chuck Harrington***

Chairman and CEO

Parsons Corporation

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## Parsons' Standards of Business Conduct

In everything that we do as a company and as individual employees of Parsons, we will be:

- ▶ **Honest, ethical and trustworthy**
- ▶ **Law abiding**
- ▶ **Dedicated and loyal to Parsons**
- ▶ **Diligent in discharging job responsibilities**
- ▶ **Economical in using company and customer resources**
- ▶ **Objective and unbiased in all business dealings**
- ▶ **Respectful of others**
- ▶ **Responsible and reliable**
- ▶ **Truthful and accurate**

# OUR CODE OF CONDUCT: THE BASICS

## Purpose of the Code

Parsons' reputation is an important corporate asset. This Code of Conduct (referred to as "the Code") establishes standards of ethical business conduct and guides and directs our [employees, officers, and directors](#)<sup>1</sup> to fulfill our commitment to integrity and to protect our reputation.

The Code provides practical information to help you act and make decisions in accordance with company standards and to evaluate and respond properly to ethics questions and challenges that may arise while performing your duties with Parsons.

This Code provides guidance for many of the ethics issues that you might face as an employee, but it cannot address every situation. You must always act in accordance with Parsons' Standards of Conduct. If a question or situation arises that is unclear or you need help to respond to it, see [Where to Go for Help, page 25](#).

## Applicability of the Code

Our Code applies to everyone at Parsons, everywhere in the world, and to third-parties with whom we conduct business, including agents, representatives, joint venture partners, consultants, and subcontractors, as described in Parsons' Standards of Ethical Conduct for Business Partners.

## Responsibilities under the Code

We must comply with the Code and avoid even the appearance of impropriety. We must report suspected violations and cooperate fully in company investigations of possible or alleged violations of the Code.

Managers have the additional obligation to ensure that their departments are operating in accordance with the Code, to provide an open, ethical environment in which employees are encouraged to raise and discuss any ethical issues or concerns and to seek guidance when they are in doubt without fear of retaliation.

Our Board of Directors adheres to our Standards of Business Conduct and is also subject to an additional code of conduct, available on [parsons.com](#).

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***"Relativity applies to physics, not ethics."***

**— Albert Einstein**

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## Decision Making Guide

Making the right decision is not always easy. The decision-making guide below will help you. Before you act, ask yourself these questions:

- ▶ Is this legal?
- ▶ Is this allowed by our policies or procedures?
- ▶ Is this consistent with our Core Values and Standards of Business Conduct?
- ▶ Am I sure this would not harm our customers, employees, shareholders, or the community?
- ▶ Am I sure this would not harm our reputation with customers or our community?
- ▶ Would this be good for the company if every employee did this?
- ▶ Would you be proud if friends, family, or our customers read about your actions in the newspaper or on social media?

If the answer to any of these questions is "no", you should not act.

[\*\*Where to Go for Help\*\*](#)

[\*\*See page 25\*\*](#)

## If You Have a Concern

We all benefit from an atmosphere of good ethical conduct and we expect everyone to follow the law and our Code of Conduct, including helping others to do so. If you observe or suspect activities or behaviors that are inconsistent with the standards of the Code (referred to as “ethics concerns”), please report the issue to an Ethics Officer or manager, or directly to the Ethics Helpline. See ***Where to Go for Help, page 23***. Managers who receive an ethics concern must immediately forward that information to an Ethics Officer.

## Strict Policy against Retaliation

It is important that every one of us feels comfortable to report potential ethics concerns. Retaliation against any employee for making a good faith report or raising an issue regarding a suspected violation of the Code is strictly prohibited and is itself a serious violation of the Code. Parsons will take appropriate action to discipline a supervisor or employee who initiates, condones, or participates in any act of retaliation.

## Violation and Enforcement

Our Code is core to who we are and want to be - for our customers, our employees and the community. We respond to inquiries and investigate reports thoroughly and thoughtfully. Corrective action may include written counseling, termination, legal action or criminal prosecution, or other appropriate action necessary to correct or address the issues identified.

## Ethics Committee and Ethics Officers

Ethics is everyone’s responsibility, but the Board of Directors ultimately oversees ethics compliance for Parsons. The CEO established the Ethics Committee, which includes executives from across the company, to educate and train employees on ethics, to investigate and resolve ethical issues, to assist employees in matters of ethical conduct and interpreting the Code and to keep the Board informed. You may contact any Ethics Officer at any time to ask a question or report an issue. See ***Where to Go for Help, page 25***.

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

**— Potter Stewart**

## Q&A

- Q. What is the relationship of policy statements to the Code, and where can I find the details of these policies?
- A. Not all items in the Code are covered by separate policy statements, but many are. We have provided references to many policies so that you can find additional information. Corporate policy statements generally include additional requirements and corporate ethical and legal guidelines on a particular subject. Policies are available on the Corporate Policy Center; if you are unable to view them on line, contact Talent Management for a hard copy. If you believe that a policy contradicts the Code, contact an Ethics Officer.
- Q. What does the Code mean when it says to avoid “the appearance of impropriety”?
- A. The perception of unethical behavior can be as damaging as unethical behavior itself. Although some people unreasonably infer misconduct from almost any situation, you have to consider how reasonable people might view your activities, based on the information available to them. You must avoid conduct that would appear to reasonable observers to be in violation of the Code.

# COMPLIANCE WITH LAWS, RULES AND REGULATIONS

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## We are obligated to comply with all applicable laws, rules and regulations

It is the personal responsibility of each director, officer and employee to comply with the standards and restrictions imposed by all applicable laws, rules and regulations in the performance of his or her duties for us.

Our CEO, Chief Financial Officer and Corporate Controller (or persons performing similar functions) are also required to promote compliance by all employees with the Code and to abide by Company standards, policies and procedures.

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## Disclosures

The information in our public communications, including in all reports and documents filed with or submitted to the SEC, must be full, fair, accurate, timely and understandable.

To ensure we meet this standard, all directors, officers and employees (to the extent they are involved in the Company's disclosure process) are required to maintain familiarity with the disclosure requirements, processes and procedures applicable to us commensurate with their duties. Such persons are prohibited from knowingly misrepresenting, omitting or causing others to misrepresent or omit, material facts about us to others, including our independent auditors, governmental regulators and self-regulatory organizations.

# FINANCIAL CONTROLS

## Accurate Recordkeeping

We rely on accurate financial reporting and recordkeeping to pay our employees and vendors, to make informed business decisions and to invoice our customers for the work we do. You contribute to our reporting and recordkeeping when you complete your time sheet or expense report, when you order and receive services and supplies from subcontractors and vendors and when you review or approve other business-related items and activities. We apply generally accepted accounting principles and record all financial transactions and activities in our financial systems. The treasury group must approve the opening of any bank account.

We expect you to always present complete and accurate information that does not intentionally hide or disguise the true situation and never to fabricate data regarding company business or services.

The submission of false or misleading information to a governmental customer may be considered a false statement or a false claim, and may have significant legal repercussions for Parsons.

## Inside Information

You may be exposed to [inside information](#)<sup>2</sup> from a customer, partner, competitor, supplier or Parsons itself in the course of your work here. Using or sharing inside information is prohibited by law and our agreements with others, sometimes for a period of time after it becomes public knowledge. We generally can't use inside information to purchase or sell any amount of securities of Parsons or another business or share inside information with third parties or even family members. Examples of inside information include the following:

- ▶ Award or termination of a substantial contract
  - ▶ Imminent filing of a bankruptcy petition
  - ▶ Imminent filing or settlement of a major lawsuit or claim
  - ▶ Information regarding a company's financial results
  - ▶ Potential or pending merger or acquisition

Please refer to our separate Insider Trading Policy for a more detailed description of the rules related to trading on inside information.

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***“The reputation of a thousand years may be determined by the conduct of one hour.”***

**— Japanese Proverb**

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## Q&A

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- Q.** My supervisor asked me to charge my time to an incorrect charge number. What should I do?
- A.** Make sure that your supervisor knows what you are really working on. If that does not resolve the problem, advise a higher-level manager or take any of the steps available to you in *Where to Go for Help, page 23*.
- Q.** Is it okay to enter a vague description of a transaction into our financial system?
- A.** No, descriptions and related supporting documentation must fully and clearly describe the underlying nature of the transaction.
- Q.** When can I trade on inside information?
- A.** You can only trade on inside information in certain circumstances after it is made public. Contact the General Counsel the Legal Department if you have any questions.
- Q.** Is it unethical to delay booking GPP because we will need it to make targets next year?
- A.** Yes. Manipulating revenue recognition in any direction is unethical and against policy. Revenue must be recognized based solely on the contract terms and actual/forecast project performance.

## Applicable Policies and Reference Material

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- ▶ Bank Accounts
- ▶ Financial Account Reconciliation and Analysis
- ▶ Records Management
- ▶ Records Retention Standards
- ▶ Relationships with Financial Institutions



# CONFLICTS OF INTEREST AND CORPORATE OPPORTUNITIES

Parsons employees must make decisions and take actions that are in the best interests of Parsons. A conflict of interest occurs when your private interests interfere, or appear to interfere, with the interests of the Company as a whole. A conflict of interest includes the existence of any circumstances that would lead a reasonable person to question whether you were acting in Parsons' best interests or your own. Many apparent conflicts can be resolved without sacrificing your interests or Parsons' interests. You must disclose to an Ethics Officer any activity or relationship that presents a potential conflict or creates the appearance of a conflict so that the Ethics Committee can determine if the situation is acceptable, can be adequately mitigated, or must be avoided. The Ethics Committee will work with you and management to identify mitigating measures wherever possible, or to avoid or eliminate conflicts that can't be controlled. Conflicts of interest can be subtle and complicated. They might involve you, your close family members, or your close friends. We want to know about situations that even create the appearance of a conflict of interest because they might be damaging to Parsons' reputation. If you have any doubt, ask an Ethics Officer about the situation to avoid possible problems in the future.

## Corporate Opportunities

Directors, officers and employees owe a duty to Parsons to advance the legitimate interests of Parsons when the opportunity to do so arises. Such persons are prohibited from directly or indirectly (a) taking personally for themselves opportunities that are discovered through the use of Parsons property, information or positions; (b) using Parsons property, information or positions for personal gain; or (c) competing with Parsons for business opportunities

## Red Flag Examples

Some conflicts, such as accepting kickbacks, trading on inside information, and competing against Parsons, are strictly prohibited. Other potential or apparent conflicts must be disclosed to an Ethics Officer to determine if they can be resolved. The following are examples of these situations:

- ▶ Buying anything from or selling anything to Parsons, except through regular programs offered to all employees.
- ▶ Hiring Parsons' vendors to perform work for you on a personal basis.
- ▶ Hiring or supervising, directly or indirectly, a close relative or close personal friend.
- ▶ Holding a financial interest (other than mutual funds or similar investment pools) in a customer, competitor, or vendor.
- ▶ Maintaining a romantic or other personal relationship with another employee, a competitor, customer, teaming partner, or vendors. We recognize that relationships sometimes develop in the workplace. If that begins to occur, ask your manager or an Ethics Officer for guidance.
- ▶ Receiving gifts or gratuities from vendors, other than inexpensive promotional items such as coffee cups or pens.
- ▶ Working or consulting directly for a customer, competitor, or vendor.
- ▶ Serving on a technical advisory board for a customer, supplier, subcontractor, teaming partner or competitor of Parsons.

## Q&A

- Q. Can I take a second job to supplement my income? Will this cause a conflict of interest problem for me?
- A. Although you are not barred from taking a second job, it must be disclosed to determine if it conflicts with your present job. You should not take a second job that conflicts with or limits your availability to perform your duties for Parsons or that uses Parsons' resources. For example, working for a customer, supplier or competitor is a conflict of interest. Discuss the situation with an Ethics Officer, so we can provide you with specific guidance.
- Q. A vendor invited me to attend a professional conference in another city as his guest, and offered to pay for my hotel, meals and airfare. Can I accept?
- A. Complimentary travel and conference fees are gifts and gratuities and must be declined. If the conference is job-related and would be beneficial to Parsons, ask your manager if Parsons will pay for your travel and expenses to attend.

## Applicable Policies and Reference Material

- ▶ Conflicts of Interest
- ▶ Employment of Close Friends and Relations
- ▶ No Fraternalization
- ▶ Outside Board Service
- ▶ Outside Employment

# GIFTS

Exchanging small gifts is customary in business in many cultures and does not present an ethical problem if the gifts are inexpensive and are handled correctly. However, gifts are sometimes offered or accepted in unethical or illegal attempts to influence decisions or gain favor, which is not okay at Parsons. Parsons will not attempt to gain or offer any business advantage by giving or accepting gifts.

## Entertainment, Gifts, or Gratuities

Generally, you may give or accept lawful, customary gifts such as modest holiday or promotional items (e.g., pens, coffee cups), unless you are involved in business with the U.S. government, where additional rules and limits apply (see page 21). Giving or receiving gifts of material value (\$50 USD or more), larger than promotional items, including meals, travel and entertainment, is generally not allowed and must be reviewed and approved in advance by your manager in consultation with the Parsons' Legal Department.

When you request reimbursement for expenses related to a gift, meal, travel, lodging or entertainment, include the recipient's name, title, company and the purpose of the gift, description of the gift, and value of the gift. All gifts given must be recorded in your expense reports. Employees are also expected to keep similarly detailed records of gifts received (giver's name, title, company, purpose of the gift, description of the gift, and value of the gift) and be able to produce those records upon request by Legal or Internal Audit.

You may only exchange gifts occasionally with others whose employers' policies allow the exchange of gifts. A gift that is requested is not a gift at all. If someone asks you or a coworker for a gift, or if you hear such a request, report the situation to your manager or an Ethics Officer. If you have any questions about gifts, ask your manager or an Ethics Officer.

Employees in business development, procurement or subcontracting, and those who manage third party work or workers must be particularly careful when it comes to gifts to avoid even the appearance that a gift might influence a business decision such as vendor selection or terms of a settlement.

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***“The most important persuasion tool you have in your entire arsenal is integrity.”***

**— Zig Ziglar**

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## Q&A

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- Q. If my spouse accompanies me on a business trip and receives a gift from the company I'm visiting, is he/she permitted to keep the gift?
- A. Your spouse is under the same ethical obligations in this regard as you. Small, token gifts within the bounds of local norms and culture may be okay. Whether offered to you or your spouse, if refusal or return of the gift would offend the gift giver, disclose the gift to your manager and an Ethics Officer to determine its proper disposition.

## Applicable Policies and Reference Material

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- ▶ International Anti-Corruption
- ▶ International Anti-Bribery Compliance Manual
- ▶ International Anti-Bribery Compliance Manual Supplement

# POLITICAL CONTRIBUTIONS

Parsons works to improve the communities in which we live and work. Being respectful of the rights and views of others, we encourage you to be active in the political process and to donate your personal time and resources in accordance with your personal political interests and beliefs. It is essential that you pursue your personal political activities as an individual. You may not attribute your personal political activities and contributions to the Company.

Most countries in which Parsons does business impose significant rules that define a corporation's ability to participate in the political process. Our Government Relations Department and General Counsel stand ready to help you comply with applicable laws and regulations. To initiate a company political contribution, submit a written proposal to Parsons' Government Relations Department and to the General Counsel for review and approval.

Note that using company time, facilities, equipment, systems or resources for political purposes may invoke controls on company donations, which should be avoided. For example, providing use of a company facility or office to a candidate for an event or fundraiser may be considered an in-kind campaign contribution.

## Applicable Policies and Reference Material

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- ▶ Political Contacts & Contributions
- ▶ Political Contributions

# CORRUPTION

We conduct ourselves and our work in an honest and fully transparent way to avoid even the appearance of corruption. Corruption is any illegal or unethical act or failure to act by a person motivated by personal gain. Corruption can lead to legal penalties and damage to Parsons' reputation.

## Bribery and Kickbacks

Parsons does not request, require, accept or offer bribes of any kind. Bribery includes giving [anything of value](#)<sup>4</sup> to another party with the intent to induce or influence the other party to act in a specific way. Kickbacks are a form of bribes. Giving or receiving bribes/kickbacks is illegal, can severely damage our reputation and is not allowed. Bribery of [government officials](#)<sup>5</sup> is also a criminal offense. Special vigilance is required with respect to international corruption and bribes and you must report any suspicious circumstances. Under the anti-bribery laws of the United Kingdom, United States, and many other nations, a company can be held liable for participating in corruption anywhere in the world even under the following conditions:

- ▶ A potential bribe is discussed or offered but is never paid.
  - ▶ The offer does not include cash or is even limited to an intangible benefit.
  - ▶ Small bribes of low-level employees/officials are common in the local area/country.
  - ▶ The offer/payment is not made by an employee, but rather by a third-party acting on behalf of the company.
  - ▶ The company did not have actual knowledge that an improper offer/payment was being made.

We will refuse any pursuit or project that suggests or requires a bribe and will only work with partners, subcontractors, and agents that do the same. If you receive a solicitation of a bribe under imminent threat to your health or safety, you may pay it, but you must report the situation to the Legal Department immediately after you are out of harm's way. Management and the Ethics Committee will assist you in responding to any requests or suggestion of bribes or kickbacks.

## Money Laundering

Money laundering is the process of making money from an illegal source appear to have originated from a legal source. More than 100 countries, including the United States, Canada, the UAE, Qatar and Saudi Arabia, have enacted anti-money laundering laws, and Parsons complies with applicable legislation. Be wary of the following "red flags" that may indicate money laundering or other corruption:

- ▶ A customer, agent, or proposed joint venture partner that is reluctant to provide complete information or is anxious to avoid reporting or record-keeping requirements.
  - ▶ Payments using monetary instruments that are not consistent with the business activities of the customer, appear to have no identifiable link to the customer or work, or have been identified as money laundering mechanisms.
  - ▶ Unusually complex deal structures, payment patterns that reflect no real business purpose, or unusually favorable payment terms.
  - ▶ Unusual fund transfers to or from countries or parties unrelated to the transaction, particularly locations known for a lack of financial transparency.

## Q&A

- Q. Does Parsons allow for facilitating payments<sup>6</sup>?
- A. No, unless there is an imminent threat to an employee's health or safety. Any threat should be reported to your manager and the Ethics Committee as soon as you are safe. Any facilitating payment should be recorded in Parsons' books and records as a facilitating payment.
- Q. Can I hire a relative of a foreign government official?
- A. In most cases, no. Parsons has a blanket policy against hiring relatives of foreign government officials who are in the chain of decision-making concerning projects which Parsons is pursuing or which we already have obtained, or who are in positions of responsibility within Ministries for which we have done work in the recent past, even if we do not have actual or potential projects with that Ministry at the time that the government official's relative is being considered. This includes hiring such relatives for summer jobs or non-paying internships.

## Applicable Policies and Reference Material

- ▶ Anti-Bribery Compliance Manual
- ▶ International Anti-Corruption

# DOING BUSINESS GLOBALLY

Few major projects are performed using only US resources. There are many important considerations when conducting business ethically around the world. This section of the Code highlights a few of them. Contact the Legal Department if you have questions about local laws, particularly if you are pursuing or doing work in a new country. Contact an Ethics Officer if you believe that a local law conflicts with the Code.

## Unsanctioned Boycotts

U.S. law and regulations prohibit any U.S. person from complying with or supporting a foreign boycott unsanctioned by the U.S. Government. Boycott requests may take the form of a bid invitation, contract, letter of credit, or oral request in connection with a transaction. You must contact the Legal Department immediately if you learn about a boycott request, receive boycott-related information, or become aware of a clause in one of our contracts requiring the boycott of another country.

## Export Controls

Export control laws restrict the shipment, transmission, or transfer of certain information, items, software, technology or services from one country to another. Restrictions also generally exist on “deemed exports,” which are releases of controlled technology and software source code to foreign nationals in the U.S. Parsons may have government export controlled information when working on contracts (including unclassified contracts) for both private and public sector customers and in every market that we serve. You are expected to protect export controlled information and technology according to all applicable export control laws and Parsons’ policies. If your work might involve the use or transfer of export controlled information, contact the Legal Department for guidance.

## Applicable Policies and Reference Material

- ▶ Export Controls
- ▶ IT Acceptable Use

# PROTECTING CORPORATE ASSETS

## Physical Property

We invest heavily to provide a safe, professional, collaborative working environment with the tools necessary to work efficiently. We expect you and your visitors and guests to respect your workspace, common areas and equipment and help us maintain it in good working order by securing equipment, tools and supplies to prevent theft or damage. Report missing or broken items to your facilities or IT staff so that they can be repaired or replaced, especially if there is an unsafe condition. In addition, it is essential that you purchase, report and properly record all assets through established procedures and systems so that we can repair, replace and maintain equipment based on our inventory records.

## Company Information

Employees must preserve and protect all tangible and intangible assets, including trade secrets belonging to Parsons. We sign agreements with our customers, partners, agents, suppliers, subcontractors, consultants, and similar parties that require us to protect each other's confidential and trade secret information. Trade secrets include any information that is not generally known to the public and that derives value or competitive advantage from not being generally known. Confidential information is information that is specifically identified as confidential or in which a customer or third party has a reasonable expectation of privacy. As a member of the Parsons team, you agree to honor our commitments and to protect company and partner trade secrets and confidential information.

You may not use trade secrets or confidential information obtained while working at Parsons for your personal [profit](#)<sup>7</sup>, and you may not share that information with anyone outside Parsons. When you leave Parsons for any reason, you must return any equipment, documents or data containing trade secrets or confidential information to Parsons. You may not disclose trade secrets or confidential information, even after you leave Parsons.

If you are asked to disclose or release trade secrets or confidential information, review the request and the information with someone in the Legal Department before you release any information and document that review with written authorization from the Legal Department.

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***“Whenever you do a thing, act as if all the world were watching.”***

**— Thomas Jefferson**

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## Q&A

- Q. I have access to renderings relating to a project on which I worked and would like to keep copies of them for my personal portfolio or for future reference on other jobs. May I download them to my personal external hard drive?
- A. No. Documents that were created or obtained during your employment are the property of Parsons and/or the customer. Such documents may also contain confidential information and may further be protected by contractual nondisclosure agreements.

## Applicable Policies and Reference Material

- ▶ Personal Information and References Privacy Procedure
- ▶ Employee Agreement & Acknowledgement of Obligation
- ▶ Privacy Notice

# PROTECTING CORPORATE ASSETS

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## Personal Information

Personal information includes any employee or third-party information that is private (e.g., health records) or [personally identifiable](#)<sup>8</sup>. We treat your personal information the same way that we ask you to treat our confidential and trade secret information. We only collect, use and disclose personal information for legitimate business purposes and when we are required to do so by law.

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## Copyright

A copyright gives the owner of original [works](#)<sup>9</sup> the right to copy, display, and distribute that work, prepare derivative works, and prevent others from doing so without permission. Works produced on the job or based on information you received at Parsons are owned by Parsons or our customers, and you must obtain Parsons' approval to reproduce, distribute, display, or publish them. You may copy or distribute reproductions of copyrighted materials that you receive through Parsons, including copyrighted materials from customers or from the Internet, only when it is allowed under Parsons' subscription or with express permission from the copyright owner.

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## Software Use

We respect the rights of software developers and owners and the significant effort that they invest in creating their work and products, including software and tools that we create ourselves. We comply with the terms of all licenses and agreements for software and other intellectual property that we purchase and provide to you for use in your work.

The Information Technology Department purchases, installs and maintains software for Parsons and manages our licensing to ensure that we respect the rights of the owners. You should not install or copy software, or share software with anyone, especially software developed or being developed by Parsons, as doing so may violate the license or prevent us from obtaining or enforcing license protection for our own intellectual property.

Your supervisor, your BU's IT representative, or the Legal Department can answer your questions about permitted use of software.

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## Applicable Policies and Reference Material

- ▶ Software Use and Licensing
- ▶ IT Acceptable Use
- ▶ Privacy Procedure
- ▶ Privacy Notice
- ▶ Copyright

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***“The time is always right to do what is right.”***

**— Martin Luther King, Jr.**

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# ELECTRONIC COMMUNICATION

## Privacy in Electronic Communication

Parsons maintains [electronic communication systems and equipment](#)<sup>10</sup> for the operation of its business. Parsons accesses and monitors our systems and equipment and may retrieve, review, print, disclose, or store any communication or information passing through, stored on, or created on them, as permitted by law. You should not expect privacy when using Parsons' electronic communication systems and equipment.

## Standards for Electronic Communication

In all forms of communication, it is essential that we be law abiding, truthful and accurate, and respectful of others. Electronic communication requires particular care because of the speed with which it is reproduced and transmitted, and because there is no way to completely delete electronic information once it has been created.

Avoid using Parsons' systems and equipment for purposes such as:

- ▶ To send, receive, or store defamatory information.
- ▶ To participate directly or indirectly in any gambling or games of chance.
- ▶ To access another person's or organization's confidential information, messages, files, or passwords without authorization.
- ▶ To access non-business related websites to an extent that interferes with Parsons' business activities or employee productivity.
- ▶ To access a website that has been prohibited by the Information Systems group or that contains patently offensive content inconsistent with our Code.

Electronic communications may become important evidence in investigations or legal matters concerning Parsons. To protect Parsons, be sure that you:

- ▶ Comply with any legal hold notice requiring the preservation of electronically stored information.
- ▶ Take care in composing and sending electronic communications to ensure that they are accurate, professional, achieve a legitimate business purpose, and are distributed only to those persons with a legitimate need to know.

## Applicable Policies and Reference Material

- ▶ Access Control
- ▶ IT Security-Access Control
- ▶ IT Acceptable Use
- ▶ Employee Personal Conduct
- ▶ Business Communications
- ▶ Social Media and Blogging



# WORKPLACE STANDARDS

## Employment Practices

Parsons is a premier provider of project management and technical solutions. Our customers value our diverse and highly qualified workforce, representative of the global community in which we work and live. We are committed to providing a safe, collaborative and respectful professional workplace for all employees.

## Equal Employment Opportunity

Diversity is a core value at Parsons. We believe that our broad backgrounds, experiences and cultures add value to our work and enrich our work environment. We recruit, retain, pay and promote employees based solely on [qualifications](#)<sup>11</sup> and performance, without regard to race, color, religion, national origin, age, sex, sexual orientation, gender identity or expression, employable physical or mental disability, veteran status, marital status, pregnancy, genetic information, or other status or characteristic protected by applicable law or regulation.

## Harassment

[Harassment](#)<sup>12</sup> has no place at any Parsons facility, work location, on business travel, or at business or corporate sponsored events (including social events). We encourage you to report any activity or behavior that can be interpreted as harassment. See [Where to Go for Help, page 25](#).

## Workplace Health and Safety

Parsons maintains a safe and healthy working environment for our employees, our customers and contractors and the public. You must promptly stop, correct or report any condition or behavior that you believe is unsafe and report all safety incidents, including near misses, timely and accurately.

## Controlled Substances and Intoxicants

We want all employees to be safe at work and to work safely. We do not allow employees to work while under the influence of alcohol or any controlled substance or to use, possess, manufacture, sell or distribute any controlled substance, [alcohol](#)<sup>13</sup> or other intoxicant while working or on [company property](#)<sup>14</sup> except as prescribed by a qualified medical professional.

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***“Integrity is the essence of everything successful.”***

**— R. Buckminster Fuller**

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## Q&A

- Q. [A coworker asked me out on a date. I said no and the employee has not asked again. Is this sexual harassment?](#)
- A. Simply asking a coworker out on a date is not sexual harassment. However, if the coworker repeatedly asks you out or your coworker makes unwanted sexual advances or references, the coworker’s conduct could be considered sexual harassment.
- Q. [Several of my coworkers and I went out for drinks after work and one of the women made sexually suggestive comments to one of the men, but all of us heard it. Is this sexual harassment?](#)
- A. Sexual harassment can take place outside the workplace when coworkers meet to socialize. Sexual harassment can be perpetrated by women as well as men. Any employee who was present and was offended by her conduct should make a report.
- Q. [I work from home. Do company workplace standards apply to my home office?](#)
- A. Most Parsons’ standards regarding personal conduct apply anytime that you are working or representing Parsons, regardless of the work location.

# WORKPLACE STANDARDS

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## Weapons

Weapons<sup>15</sup> are off limits while on company property<sup>16</sup> or anywhere company business is conducted<sup>17</sup>, regardless of whether you hold a concealed weapons permit or are allowed by law to possess a weapon.

If you work in a jurisdiction that allows residents to store weapons hidden from view in a locked, personal vehicle in designated parking places provided by their employer, you should seek guidance from management to make parking arrangements.

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## Workplace Violence

Our safe and respectful workplace policy prohibits threatening, bullying<sup>18</sup>, violence at work, while working, while on company-related business, or while operating any vehicle or equipment owned or operated by Parsons.

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## Human Trafficking

We respect and protect individual human rights and comply with the employment laws in every location in which we do business. Parsons does not tolerate forced labor, 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.

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***“The measure of a man’s real character is what he would do if he knew he would never be found out.”***

**— Thomas Macaulay**

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## Applicable Policies and Reference Material

- ▶ Americans with Disabilities Act (ADA) Interactive Process to Reasonably Accommodate
- ▶ Diversity
- ▶ Employee Personal Conduct
- ▶ Equal Opportunity and Affirmative Action
- ▶ Harassment
- ▶ Corporate Safety, Health & Environment Policy Statement
- ▶ Safety Awareness
- ▶ Substance Abuse
- ▶ Human Trafficking
- ▶ Weapons
- ▶ Workplace Violence and Bullying Awareness and Prevention

# COMPETING FAIRLY

We compete in the marketplace based on the superior quality and competitive pricing of our professional services and products. We never compromise our high ethical standards by attempting to fix prices or by using confidential or proprietary information belonging to our competitors.

## Antitrust

Our global activities are subject to the antitrust laws of the United States and many other countries. These laws generally prohibit agreements or actions that restrain trade or competition. Examples include agreements among competitors to fix or control prices, boycotts of targeted suppliers or customers, allocation of territories or markets between competitors, or agreements not to bid certain projects to limit competition. You must avoid activities that create even the appearance of anticompetitive behavior.

## Trade Secrets

A trade secret can be any useful information that is not generally known and that derives value from not being generally known. Trade secrets include formulas, designs, engineering or technical information, pricing information, product or marketing plans, and customer lists. You may use or distribute trade secrets only with written approval from the owner of the information.

Information or know-how that is generally known to professionals in the field or that is otherwise publicly available is not a trade secret. For example, information available to the public in annual reports, financial statements, websites, newspapers, magazines, professional journals, or at trade shows is not a trade secret. Parsons competes fairly by gathering competitive data only from publicly available sources or reputable firms that gather and compile industry data legally.

## Guidelines for Competing Fairly

- ▶ Endeavor to deal fairly with customers, service providers, suppliers, competitors and employees. Do not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any unfair dealing practice
- ▶ Avoid any discussion with competitors about pricing, contract terms, bids, or proposals.
- ▶ Never directly or indirectly solicit any trade secret or confidential or proprietary information from an employee or a former employee of another company.
- ▶ Never use trade secrets or confidential or proprietary information from a former employer or another company.
- ▶ Never make disparaging statements or spread false information about competitors.
- ▶ Contact the Legal Department immediately if you learn of information that raises questions or concerns about the antitrust or trade secrets laws.

## Q&A

- Q. I kept a copy of my business contacts from my prior employer on my personal computer. Can I now use those contacts from my personal computer to help gain business for Parsons?
- A. No. You cannot use this information unless you have written permission from your prior employer.
- Q. I spent the first five years of my career as an engineer with a competitor of Parsons. Can I use the know-how that I gained from my prior employer to do my job at Parsons?
- A. Yes. General knowledge gained in one position can be used over the course of your career. However, proprietary systems, information, or processes cannot be used. The lines are not always clear; if you have any questions, contact an Ethics Officer or the Legal Department for guidance.

# INVESTIGATIONS AND AUDITS

At Parsons, we are truthful, accurate, honest, and trustworthy in all that we say and do. To help provide transparency and accountability, you must fully cooperate with any authorized audit or [investigation](#).<sup>19</sup>

## Government Investigations

We cooperate with governmental authorities conducting investigations or gathering information relating to potential violations of law. If you receive a request for information, subpoena, or other legal document regarding company business from any governmental agency, notify the General Counsel immediately and preserve any related documents, electronically stored information, or other evidence. The reason for this is simple. Parsons wants to assure that its legal rights and yours are protected while providing the government with accurate information in response to government requests. Parsons also wants to assure that the requests are clearly understood and that the documents provided are responsive and complete. The General Counsel will help you review information and respond to governmental authorities.

## Company Investigations

You must fully cooperate with any internal investigator, including third-parties retained by Parsons, by providing truthful and complete responses, preserving and providing relevant information or evidence, and not discussing the investigation with anyone unless you are instructed to do so. If you have any concerns about the legitimacy of an investigator, contact an Ethics Officer.

## Audits

Audits are performed by management, customers, government agencies, Internal Audit, and external financial auditors. You must cooperate with auditors and provide information that is truthful and accurate. The corporation's Internal Audit Department is authorized by the Audit Committee of the Board of Directors to have access to all company records and employees. If you have any question about an audit or auditor, contact your supervisor.

## Legal Matters

The Legal Department is responsible for managing Parsons' legal matters, including the engagement of any lawyers or law firms. Refer all legal matters relating to Parsons' business to the Legal Department. If you receive documents that appear to have legal significance to Parsons, send them to the Legal Department. If you have a question, contact the Legal Department.

## Searches

We expect you to cooperate in Parsons' reasonable security efforts and report any suspected harmful conduct to security personnel. As permitted by law and as necessary to determine whether any person has engaged in conduct that is harmful to Parsons or violates this Code, Parsons may monitor or search company computers, systems, telephones, facilities, and vehicles on company premises.

## Q&A

- Q. Internal Audit has asked to speak to me about a matter that they are investigating. I don't know very much about it. Should I ask others in my department so I am more informed?
- A. No. Internal Audit is interested in learning what you know from your personal experience and will speak to other employees to obtain additional information as needed. Do not discuss the investigation with others.
- Q. As part of an internal investigation, I was asked about a specific event. I have relevant information about a related issue, should I disclose it to the investigator?
- A. Yes. If you have information that you believe might be relevant to the investigation, you must provide it, even if the question was not specifically asked.

## Applicable Policies and Reference Material

- ▶ Government Investigations

# MEDIA RELATIONS

## Media Contacts

The Marketing & Communications Department manages all contacts with the media, including online and social media, television, radio and all forms of print media, to ensure that anything broadcast or published about Parsons is current, accurate and truthful and to ensure that we protect customer and personal information appropriately. If you are contacted by a member of the media or are asked for a statement regarding Parsons, or regarding any project or litigation with which Parsons is involved, refer the inquiring party to the Marketing & Communications Department at (626) 440-4590.

The Internet and wide range of social media, blogs, chat rooms, message boards, and the widespread use of cellular phones with video capability have changed the definition of “media” and “writer / producer.” Any inquiry from a blogger, writer, or reporter, irrespective of the medium, should be referred to the Marketing & Communications Department, just like any inquiry from a newspaper, television or radio reporter.

## Social Media

When using social media, be professional, kind, discreet, and truthful. We cannot recall, retract, revise or control the distribution of a post once we hit “update” or “send.” Represent yourself and Parsons carefully, thoughtfully, responsibly and well in any online activity:

- ▶ Protect and do not disclose trade secrets and confidential information that belong to Parsons, our customers and partners.
- ▶ Be sure that you know all of the facts and only post the truth. Remember that most social media postings result in unsolicited forwarding (or “retweeting”), commentary, opinions and responses, many from uninformed people, that neither you nor we can control.
- ▶ Clearly state that the views expressed are your personal views and not the view of Parsons.
- ▶ Make it clear that you are not speaking on behalf of Parsons or in any type of expert capacity.

## Q&A

- Q. I attended a public meeting of a state transportation agency for which Parsons is performing a significant amount of work. After the meeting, I was approached by a reporter for a local newspaper who asked, “This is a very expensive project for the State. How can Parsons justify charging so much on this job?” I was involved in the preparation of Parsons’ bid and am very capable of explaining how the fee was determined and how it delivers value for the cost, but I wasn’t sure whether I should talk with her. Should I have talked with her?
- A. No, you should not engage the reporter in such a discussion. Refer the reporter to the Corporate Relations Department, even if the discussion is said to be “off the record.”
- Q. Is it okay to make “off the record” or anonymous comments to the media?
- A. No, even if the discussion is said to be “off the record” or the reporter promises to not name you or Parsons, you should never provide work-related information directly to the media.

## Applicable Policies and Reference Material

- ▶ Social Media and Blogging
- ▶ Media Communications: Interviews and Media Statements

# U.S. GOVERNMENT CONTRACTS

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## Accuracy and Compliance

If you are involved in negotiating or executing government prime contracts or subcontracts, you must ensure that all statements, communications, and representations to the customer representatives are accurate and truthful. The federal government has special rules on accounting for costs, proposal and bidding procedures, pricing, and time charging, and these rules must be followed. All information regarding specifications, quality control, and testing for government projects must also be reported accurately. These rules may apply whether Parsons is performing as a prime contractor or as a subcontractor.

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## Bribes, Gifts, Gratuities, and Kickbacks

Bribery of government officials, kickbacks, and illegal gratuities are a violation of the Code and are prohibited by law. You must avoid even the appearance of improper gift giving or attempting to influence any government official. It is also a violation of federal law for Parsons to pay a commission or contingent fee to any person to solicit or obtain a government contract, with limited exceptions. In addition, we are required by law to promptly report any violation of the kickback laws to the U.S. Government if we have reasonable grounds to believe that a kickback has occurred.

Federal, state, and local government employees are subject to various ethics and gift laws and regulations. Contact Legal prior to providing a gift or anything of value to a government employee or official. Also, before entering into any arrangement with any person to solicit or obtain a government contract, contact the General Counsel.

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## National Security and Classified Information

In the course of our work, it is sometimes necessary for employees to access, generate, or store information classified for national security purposes. Only employees with the proper security clearance are permitted to access such data. Employees are required to safeguard classified information and to ensure that it is not improperly released. Any suspected breach of national security regulations must be reported immediately to the responsible manager administering government security functions.

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## Procurement Integrity: Procurement-Sensitive and Confidential Data

Do not accept, or attempt to obtain, either directly or indirectly, government information or documents that are procurement sensitive, a competitor's proprietary or confidential data, or information regarding a competitor's bid or proposal if you have any reason to believe that the release of such information is unauthorized.

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## Employing Current or Former Government Employees

Special restrictions apply to recruiting current or former government personnel and retaining them as employees or consultants. Before you enter into such discussions with any individual employed by the government as either an employee or a consultant within the last 3 years, obtain the approval of the responsible Director of Talent Management.

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## Applicable Policies and Reference Material

- ▶ Joint Bidding on U.S. Federal Government Contracts
- ▶ Information Classification and Secure Handling

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## See Also

- ▶ Primer on U.S. Government Ethical Standards: Gifts and Gratuities

# WAIVERS; NO RIGHTS CREATED

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## Waivers

Before an employee, or an immediate family member of any such employee, engages in any activity that would be otherwise prohibited by the Code, he or she is strongly encouraged to obtain a written waiver from the Board or other appropriate officer or body.

Before a director or executive officer, or an immediate family member of a director or executive officer, engages in any activity that would be otherwise prohibited by the Code, he or she must obtain a written waiver from the Board. Such waiver must then be disclosed to our shareholders, along with the reasons for granting the waiver.

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## No Rights Created

This Code is a statement of certain fundamental principles, policies and procedures that govern our directors, officers and employees in the conduct of our business. It is not intended to and does not create any rights in any employee, customer, client, visitor, supplier, competitor, shareholder or any other person or entity. It is our belief that the policy is robust and covers most conceivable situations.

# CORRECTIVE ACTIONS AND SANCTIONS

## Speak Up

Our commitment to integrity goes beyond our individual actions. Allowing unethical or unlawful behavior to go unreported can be just as harmful as participating in the behavior. Promptly report suspected violations of laws, rules, regulations or the Code to a supervisor, an Ethics Officer, or the Ethics Helpline.

Parsons recognizes the courage required to speak up, and we will not tolerate any form of retaliation against an employee who reports a suspected violation of the Code or cooperates in an investigation of a reported violation. If you or any other employee experiences retaliation, contact an Ethics Officer or the third-party Ethics Helpline immediately. Appropriate disciplinary action, up to and including termination, will be taken against anyone who retaliates.

When notified of a violation, the Ethics Committee or the Legal Department will initiate an investigation. Employees are required to cooperate with investigators by providing complete and accurate information, preserving and providing relevant information or evidence, and not discussing the investigation with anyone unless instructed to do so. Parsons will also keep the matter confidential to the extent possible and will limit disclosure of information regarding an investigation to those who have a legitimate need to know.

If the Ethics Committee or other appropriate officer or body determines a violation has occurred, discipline, up to and including termination, can be imposed. In some cases, Parsons may report violations to governmental or law enforcement agencies.

## Whistleblower Provision

Nothing in this Code of Conduct prevents you from reporting possible violations of law or regulation to any governmental agency or entity, including but not limited to the U.S. Department of Justice, the Securities and Exchange Commission, Congress, and any agency Inspector General, or making other disclosures that are protected under the whistleblower provisions of federal law or regulation. You do not need the prior authorization of the Legal Department to make any such reports or disclosures and you are not required to notify Parsons that you have made such reports or disclosures.

Pursuant to 18 USC § 1833(b), an individual may not be held criminally or civilly liable under any federal or state trade secret law for disclosure of a trade secret: (i) made in confidence to a government official, either directly or indirectly, or to an attorney, solely for the purpose of reporting or investigating a suspected violation of law; and/or (ii) in a complaint or other document filed in a lawsuit or other proceeding, if such filing is made under seal. Additionally, an individual suing an employer for retaliation based on the reporting of a suspected violation of law may disclose a trade secret to his or her attorney and use the trade secret information in the court proceeding, so long as any document containing the trade secret is filed under seal and the individual does not disclose the trade secret except pursuant to court order.

Please refer to our separate Whistleblower Policy for a more detailed description of the rights and procedures available to those reporting or disclosing possible violations.

**“Integrity is what we do, what we say, and what we say we do.” — Don Galer**

## Q&A

- Q. I reported a suspected violation of the Code to my supervisor, but nothing has happened. What should I do?
- A. Report the situation to an Ethics Officer.
- Q. I reported a suspected violation of the Code to my supervisor, and now I think my supervisor is retaliating against me. Where can I go for help?
- A. Escalate your complaint of retaliation to a higher level of management or to any Ethics Officer. You should contact the person with whom you feel most comfortable.



# FOOTNOTES

- <sup>1</sup> Parsons officers, directors, and employees will be collectively referred to as “employees” or “you” in this Code.
- <sup>2</sup> Inside information is any material non-public information.
- <sup>3</sup> Telephones, computers, stationery, copying, employee time, office facilities, refreshments, etc.
- <sup>4</sup> Anything of value: cash, cash equivalents, loans, goods, services, travel, entertainment, reimbursement of expenses, internships or job offers, or anything else of value to the recipient.
- <sup>5</sup> Government officials include any government employee (including employees of state-owned companies), political candidates, or officials of public international organizations. The FCPA defines political parties separately, but applies similar rules and standards.
- <sup>6</sup> Facilitating payments, sometimes known as grease payments, refer to money or goods (often relatively modest) given to a public official to facilitate or hasten the performance of an existing duty.
- <sup>7</sup> Use for personal profit includes taking advantage of such information by (a) trading, or providing information for others to trade, in securities of any company; (b) acquiring a property interest of any kind; or (c) receiving compensation of any kind for communicating such information to any other person.
- <sup>8</sup> Information that pertains to an individual, which, alone or with other information identifies an individual.
- <sup>9</sup> Works covered by copyright include magazine documents, articles, photos, designs, and software programs.
- <sup>10</sup> Electronic systems and equipment include computers, cell phones, email, voice mail, video transmissions, instant messages, and all similar means.
- <sup>11</sup> Job qualifications include education, experience, and skills, in accordance with local laws, customs, and labor market conditions.
- <sup>12</sup> Harassment includes offensive jokes, comments, gestures, pictures, email or similar communications relating to race, religion, national origin, age, gender, or disability. Sexual harassment includes unwelcome sexual advances, requests for sexual favors, sexually suggestive jokes or comments, touching, gestures, pictures, email or similar communications, or inappropriate comments about appearance.
- <sup>13</sup> Where allowed by law, consumption of modest amounts of alcohol at company events or meals is allowed, provided that the employee is not impaired or legally under the influence of alcohol as a result and provided that the employee is not subsequently operating company equipment or vehicles.
- <sup>14</sup> Company property includes any property owned, leased, or controlled by Parsons.
- <sup>15</sup> Weapons include guns, knives with blades longer than 4 inches, explosives, or any chemical whose purpose is to cause harm to another person.
- <sup>16</sup> Company property includes any property owned, leased, or controlled by Parsons.
- <sup>17</sup> Including customer locations, field sites or storage areas, customer locations, trade shows, restaurants, or company event venues.
- <sup>18</sup> Parsons defines bullying as direct or indirect verbal comments, actions, behavior, or tactics such as verbal abuse or psychological manipulations that are used to harm an individual or attempt to harm an individual.
- <sup>19</sup> Investigation: a non-routine inquiry of Parsons or its employees regarding a possible violation of Parsons’ policies, the Code of Conduct, or the law.

# WHERE TO GO FOR HELP



You may resolve legal and ethical questions and report legal and ethical violations you experience on the job in a variety of ways. If you have any questions about an ethical or legal issue or if you want to know how to proceed if you observe a violation, the following channels are available:

- 1 Contact the next level of supervision in your department or location.
- 2 Contact the General Counsel or a member of the Legal Department.
- 3 Contact any Ethics Officer or contact the Ethics Committee. Contact may be made under your own name or anonymously in any of the following ways:
  - ▶ Call the Ethics Officer by telephone or email
  - ▶ 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):
    - ▶ 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 300, Centreville, VA 20120

For matters involving the Department of Defense, report suspected violations directly to appropriate government officials using the Department of Defense Hotline: 1-800-424-9098.

Present your inquiry clearly and state the time by which you need a response. Also, give the facts of a suspected violation with as many details as possible.

If your situation requires that your identity be kept secret, Parsons will protect your anonymity unless required by law to disclose it. In some circumstances, however, violations may only be successfully investigated and ethical or legal standards enforced if all parties cooperate in the investigation. Therefore, for the successful completion of an investigation, you may have to agree to release your identity to the parties involved.

Parsons also provides Questions and Answers on the Code at the Ethics Homepage on the PWeb.

# **PARSONS**

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