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 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 include 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 personnel and supply chain 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 applicable laws, regulations, and contract terms. In addition, Business Partners are to meet all license and registration requirements of applicable jurisdictions. In international business transactions, care is to be taken to comply with export control and trade compliance laws and regulations.

ACCURACY OF 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.

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 all anti-corruption laws of the various countries and jurisdictions in which they conduct business and 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 only used in accordance with contractual agreements. There are circumstances when Business Partners may have access to personal information. Compliance with privacy laws of various countries is required.
STANDARDS OF ETHICAL CONDUCT

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 the Parsons Business point of contact.

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 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, human trafficking, and any form of forced labor are prohibited.

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.
STANDARDS OF ETHICAL CONDUCT

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 concern, the following channels are available to you:

1. Contact your Parsons manager;

2. Contact the Chief Ethics & Compliance Counsel or a member of Parsons Legal Department;

3. Contact the Ethics Committee directly via phone, email, or by writing to:
   2101 Wilson Boulevard, Suite 900; Arlington, VA 22201;

4. Contact our EthicsPoint website or Helpline. EthicsPoint is administered by a third party vendor and allows for anonymous reporting.
   www.parsons.ethicspoint.com
   United States: 1-888-887-9151
   Canada: 1-888-418-0985
   Collect from any location: 1-503-726-2411
   (See EthicsPoint website for dialing instructions from other countries)