

S3 THIRD PARTY CODE OF CONDUCT



Dear Valued Partner,

Like you, S3 is fully committed to dealing honestly and fairly with our employees, partners, customers, suppliers, shareholders and the communities in which we live and work. We apply the highest standards of ethics and compliance to our business conduct, and we seek out partners and suppliers who maintain the same high standards. S3 recognizes the critical role our partners and suppliers play in maintaining S3's reputation and ability to do business worldwide. Accordingly, we expect ourselves and our partners with whom we do business, including our suppliers, subcontractors, consultants and joint ventures ("**Third Parties**"), to adhere to the ethics and compliance standards set forth below in this document.

Complying with Laws

- Complying with the laws of relevant countries, including without limitation laws concerning public procurements.

Counteracting Corruption and Bid Rigging

- Refraining from bribing government officials and violating the U.S. Foreign Corrupt Practices Act and applicable anti-bribery laws of other countries.
- Actively and consistently counteracting any criminal or unethical influence on decisions taken by S3, or other companies and institutions, and fighting corruption within our own companies.
- Not engaging in any act that would bring into question any of S3's or the Third Party's reputation.
- Acting with integrity in all dealings
- Not participating in anti-competitive bid rigging.

Counteracting Illegal Employment and Respecting the Fundamental Rights of Employees

- Complying with applicable legal requirements for employment.
- Respecting the health, safety and personal rights of their employees and adherence to the principles of respect, fairness and non-discrimination. Employing and remunerating employees on the basis of fair and compliant contracts and avoid the act or the appearance of engaging in human trafficking.

Respecting the Environment

- Observing applicable environmental standards.

Protecting Technology Transfers

- Observing and complying with applicable restrictions on technology transfer, including the export control laws and regulations of the U.S., other countries and other relevant jurisdictions.

Reporting Violations of the Code

- Reporting to S3 any violations of this Code of Conduct, insofar as these violations affect their business relations with S3.
- Reporting to S3 any knowledge of misconduct on the part of S3 employees.
- Resolving any suspicious cases and to cooperate fully with S3 in this regard.

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Contact S3

- Jessica Bejarano, PAE Chief Ethics & Compliance Officer; tel.: +1 240-426-3183; jessica.bejarano@pae.com
- Whit Cobb, PAE Sr. Vice President & General Counsel; tel. +1 703-717-6016; whit.cobb@pae.com
- PAE Compliance Hotline, +1 703-656-7500 or 888-360-4697. Information received over the hotline remains completely anonymous because with these special telephone numbers the caller cannot be identified.

Declaration of Adherence to the S3 Third Party Code of Conduct

_____ has received the S3 Third Party Code of Conduct and, in addition to its other contractual obligations to S3, hereby agrees to abide by it.

Company: _____

By (signature): _____

Name (printed): _____

Title: _____

Date: _____