

VSE SUPPLIER CODE OF CONDUCT

“For over 50 years VSE has set the highest ethical standard for conducting business in areas from corporate and social responsibility to sound business practices including compliance with all applicable laws and regulations while delivering the best product at the right time and at the right price to our customer. In turn, VSE expects the same commitment to a high standard of business ethics from our suppliers.

“The VSE Supplier Code of Conduct establishes the principles expected of our suppliers and passes to them our commitment that ensures a legacy of positive relationships. Our goal is to work with suppliers to ensure full compliance with these principles, as they in turn apply them to their own suppliers. The Code is made up of sections that outline standards for labor, health, safety, the environment, and standards relating to business ethics.

“VSE considers adherence to the principles of this code in selection of suppliers and teaming partners and expects full compliance.”

Maurice A. Gauthier, CEO, Signature on file

VSE SUPPLIER CODE OF CONDUCT

By acceptance of any purchase order, subcontract, vendor business agreement, teaming agreement or consultant agreement, the “supplier” or teaming partner accepts the following standards of conduct, known as the “VSE Supplier Code of Conduct” and acknowledges the commitment by VSE and itself to adhere to these standards.

Supplier Relationships

The standards set forth herein are expected of all suppliers to VSE including any parent companies, other legal entities, partners, subcontractors, and employees of the supplier. This document shall be made available to all employees and subcontractors of the supplier in a local language that is understandable to the employee or subcontractor. VSE expects the supplier to work with its own supply chain to ensure the principles and standards set forth in this code or an equivalent interpretation is met by its suppliers.

Forced or Involuntary Labor

VSE Suppliers will not use forced or involuntary labor of any type (e.g., forced, bonded, indentured or involuntary prison labor); employment is voluntary.

Child Labor

VSE Suppliers will not use child labor. The term “child” refers to any person employed under the age of 15 (or 14 where the law of the country permits), or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. We support the use of legitimate workplace

apprenticeship programs which comply with all laws and regulations applicable to such apprenticeship programs.

Wages and Benefits

VSE Suppliers will, at a minimum, comply with all applicable wage and hour laws and regulations, including those relating to minimum wages; overtime hours, piece rates and other elements of compensation, and provide legally mandated benefits.

Working Hours

VSE Suppliers will not exceed prevailing work hours and will appropriately compensate overtime. Workers shall not be required to work more than 60 hours per week, including overtime, except in extraordinary business circumstances with their consent. In countries where the maximum work week is less, that standard shall apply.

Nondiscrimination

VSE Suppliers will not discriminate in hiring and employment practices on grounds of race, religion, age, nationality, social or ethnic origin, sexual orientation, gender, gender identity or expression, marital status, pregnancy, political affiliation, or disability.

Respect and Dignity

VSE Suppliers will treat all employees with respect and will not use corporal punishment, threats of violence or other forms of physical coercion or harassment.

Freedom of Association

VSE Suppliers shall respect the legal rights of employees to join or to refrain from joining worker organizations, including trade unions. Suppliers have the right to establish favorable employment conditions and to maintain effective employee communication programs as a means of promoting positive employee relations that make employees view third-party representation as unnecessary.

Health and Safety

VSE Suppliers will provide their employees with a safe and healthy workplace in compliance with all applicable laws and regulations. Consistent with these obligations, Suppliers must have and implement effective programs that encompass life safety, incident investigation, chemical safety, ergonomics, etc., and provide the same standard of health and safety in any housing that is provided for employees. Suppliers should strive to implement management systems to meet these requirements.

Protection of the Environment

VSE Suppliers will operate in a manner that is protective of the environment. At a minimum, Suppliers must comply with all applicable environmental laws, regulations and standards, such as requirements regarding chemical and waste management and disposal, recycling, industrial wastewater treatment and discharge, air emissions controls, environmental permits and environmental reporting. Suppliers must also comply with any additional environmental requirements specific to the products or services being provided to VSE as called for in design and product specifications, and contract documents. Suppliers should strive to implement management systems to meet these requirements.

Laws, Including Regulations and Other Legal Requirements

VSE Suppliers will comply with all applicable laws and regulations in all locations where they conduct business.

Ethical Dealings

VSE expects our Suppliers to conduct their business in accordance with the highest ethical standards. Suppliers must strictly comply with all laws and regulations on bribery, corruption and prohibited business practices.

Communications

VSE Suppliers must make the VSE Supplier Code of Conduct and other relevant information available to employees in the native language(s) of the employees and supervisors.

Monitoring/Record Keeping

VSE Suppliers must maintain documentation necessary to demonstrate compliance with the VSE Supplier Code of Conduct Principles and must provide VSE with access to that documentation upon VSE's request.

Deliverables/Products and Services

VSE Suppliers must ensure that all deliverables to VSE Corporation and its end user are sufficiently safe and contain no hidden hazards, known or unknown that could jeopardize life, limb or property.

Notification of Mis-Conduct

It is inherent upon each supplier to self-govern its employee(s) conduct as well as industry best practices and standards. Disclosure of "material act of mis-conduct that run counter to the VSE Supplier Code of Conduct should be made to the cognizant VSE Procurement Manager or VP of Contracts and Procurement.

Responsibility: Is the responsibility of the Vice President of Contracts and Procurement to enforce this policy (Supplement "VSE SUPPLIER CODE OF CONDUCT") and maintain the timely updating of its objectives.