

CACI SUPPLIER CODE OF CONDUCT

INTRODUCTION

For CACI, including its parent, subsidiaries, and affiliated entities (collectively referred to herein as “CACI”), our good character drives our decisions and guides our actions. For more than 50 years, our good character has been the CACI distinction that enables us to deliver world-class information solutions and services with honesty, integrity, commitment, and respect. Our suppliers are an important and integral part of our success, and we look to partner with responsible companies that share our values and our uncompromising commitment to high ethical standards. This document outlines the Code of Conduct standards that we expect our suppliers, their officers, employees, and representatives to comply with.

LEGAL COMPLIANCE

Our suppliers are expected to, at a minimum, maintain full compliance with all federal, state, and local laws and regulations applicable to the operation of your business.

WORKPLACE ENVIRONMENT

NONDISCRIMINATION

Our suppliers are expected to maintain a work environment free from all forms of discrimination and to provide their employees and prospective employers with equal opportunity for employment, without regard to race, religion, color, sex, national origin, age, citizenship, military or veteran status, ancestry, sexual orientation, gender identity or expression, marital status, or mental or physical disability, or other status protected under applicable federal, state or local law or regulation so long as the essential functions of the job can be competently performed with or without reasonable accommodation.

HARASSMENT

Our suppliers are expected to maintain a work environment free from physical, psychological, or verbal harassment or intimidation, or any other form of abusive conduct.

WAGE AND BENEFITS

Our suppliers are expected to pay their workers at least the minimum compensation required by local law and provide all legally mandated benefits. In addition to payment for regular hours of work, workers must be paid for overtime at such premium rate as is legally required.

CHILD LABOR

Our suppliers are expected to ensure that child labor is not used in the performance of work. The term “child” refers to any person under the minimum legal age for employment where the work is performed.

HUMAN TRAFFICKING

Our suppliers are expected to not engage in the use of forced, bonded (including debt bondage) or indentured labor, involuntary prison labor, slavery, or trafficking of persons. This includes transporting, harboring, recruiting, transferring, or receiving vulnerable persons by means of threat, force, coercion, abduction, or fraud for the purpose of exploitation.

SUBSTANCE ABUSE AND DRUG FREE WORKPLACE

Our suppliers are expected to have policies and procedures in place to ensure that its employees do not conduct work while under the influence of alcohol, illegal drugs, or misused medications, whether prescription or non-prescription. Suppliers are expected to implement and enforce policies and procedures that prohibit their employees from using, possessing, or selling illegal drugs, alcohol, or misusing medications while performing job functions.

HEALTH AND SAFETY

Our suppliers are expected to comply with all applicable health and safety laws, regulations, and directives. Suppliers should protect the health, safety, and welfare of their personnel, visitors, and others who may be affected by their activities.

ETHICAL BUSINESS PRACTICES

PROCUREMENT INTEGRITY

Our suppliers are expected to maintain the integrity of our procurement and acquisition processes. Suppliers must not improperly obtain or use competitors' confidential or proprietary information for their own benefit. If a supplier becomes aware of any such confidential or proprietary information, they should promptly take steps to avoid its improper use and inform CACI as appropriate.

CONFLICTS OF INTEREST

Our suppliers are expected to avoid all conflicts of interest, including organizational conflicts of interest (OCIs) and personal conflicts of interest, or circumstances giving the appearance of a potential conflict of interest in their dealings with CACI. Further, we expect our suppliers to notify CACI of any situations of potential or apparent conflicts between their interests and the interests of CACI and facts and circumstances that may create an OCI or the appearance of an OCI.

ANTI-CORRUPTION LAWS

Our suppliers are expected to comply with all applicable anti-corruption laws, directives, and regulations, such as the U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act. Our suppliers must refrain from offering or making any improper payments of money (or anything of value) to government officials, political parties, candidates for public office, or other persons. This includes a prohibition on facilitating payments intended to expedite or secure performance of a routine governmental action that the government official is already obligated to perform. Our suppliers must not offer any illegal payments to, or receive any illegal payments from, any customer, supplier, their agents, representatives, or others. The receipt, payment, and/or promise of monies or anything of value, directly or indirectly, intended to exert undue influence or improper advantage is prohibited. This prohibition applies even in locations where such

activity may not violate local laws.

FAIR COMPETITION/ANTITRUST

Our suppliers are expected to conduct business in accordance with all applicable antitrust or competition laws and regulations. This includes avoiding business practices such as entry into arrangements that unlawfully restrain competition; improper exchange of competitive information; price fixing, bid rigging, or improper market allocation.

GIFTS AND GRATUITIES

Our suppliers are expected to compete on the merits of their products and services. The exchange of business courtesies must not be used to gain an unfair competitive advantage. In every business relationship, our suppliers must ensure that the offering or receipt of any gift or business courtesy is permitted by law and regulation, that these exchanges do not violate the rules and standards of the recipient's organization, and that they are consistent with reasonable marketplace customs and practices. Any gifts, entertainment or other accommodation must be professional in nature and not excessive in cost. A gift that could reasonably be perceived to influence business can damage both CACI and our supplier's reputations and should not be given.

INSIDER TRADING

Our suppliers and their employees are expected to not use material or non-publicly disclosed information obtained during their business relationship with us as the basis for trading or for enabling others to trade in the stock or securities of our company or those of any other company.

PROTECT INFORMATION AND KEEP ACCURATE RECORDS

PROTECTING INFORMATION

Our suppliers are expected to take proper care to protect information, to include any sensitive information, including classified, controlled, proprietary and personal information, competition sensitive information and intellectual property. Information maintained on electronic systems should be protected against cyber intrusions and other unauthorized use or access, through appropriate physical and electronic security procedures. CACI information should not be used for any purposes other than the business purpose for which it was provided without prior authorization.

MAINTAIN ACCURATE RECORDS

Our suppliers are expected to maintain accurate records that completely reflect all transactions related to CACI business. All records submitted as evidence of a business transaction with CACI, its customers, and regulatory authorities must be accurate and complete and fully represent the transaction being documented. Suppliers should never falsify records or alter, conceal, or destroy any document to misrepresent any fact, circumstance, or transaction related to CACI business.

ENVIRONMENT AND SUSTAINABILITY

Our suppliers are expected to comply with all applicable environmental laws, regulations, and directives and operate as responsible stewards of the environment. Our suppliers should operate in a manner that actively manages risk, conserves natural resources, and protects the environment.

SUPPLY CHAIN SECURITY

Our suppliers are expected to implement practices and procedures to ensure the security of their supply chain.

COUNTERFEIT PARTS

Our suppliers are expected to develop, implement, and maintain methods and processes to prevent the introduction of electronic counterfeit parts and materials into their final product deliverables. Effective processes should be in place to detect electronic counterfeit parts and materials and exclude them from the delivered product.

CYBERSECURITY

Our suppliers are expected to safeguard and protect information entrusted to them and information generated or developed by them in support of our programs from cyber intrusions, unauthorized access, destruction, use, modification, or disclosure.

SUPPLIER QUALITY

Our suppliers are expected to have established quality assurance processes and procedures to identify and correct defects to ensure their products and services meet or exceed contractual quality requirements. All required testing and inspection must be completed to ensure their work product meets with the required quality standard.

INTERNATIONAL BUSINESS AND RESPONSIBLE SOURCING

EXPORT/IMPORT CONTROL

Our suppliers are expected to ensure that their business practices comply with all applicable laws and regulations governing the export and import of domestic- and foreign-origin parts and components and related technical data. Suppliers shall provide complete and accurate information and obtain export licenses and/or authorizations when necessary.

CONFLICT MINERALS

Our suppliers are expected to comply with the federal laws and regulations requiring reporting companies to make specialized disclosure and conduct due diligence concerning their use of conflict minerals that may have originated in the Democratic Republic of the Congo (DRC) or an adjoining country. Conflict minerals include cassiterite, columbite-tantalite, gold and wolframite, or their derivatives (tantalum, tin, and tungsten). We expect our suppliers to develop due diligence processes to meet our obligations to ensure that all products are responsibly manufactured.

COMPLIANCE WITH THE SUPPLIER CODE OF CONDUCT

Our suppliers are expected to comply with this Supplier Code of Conduct. In the event of a violation of this code, CACI will pursue corrective action to remedy the situation to include terminating the relationship if the violation cannot be satisfactorily resolved under the terms of the existing contract.

LOWER TIER SUPPLIERS

Our suppliers are expected to flow down the essence of this Supplier Code of Conduct to any lower tier subcontracting partner.

CONTACT US

Suppliers that have questions, or that wish to report inappropriate conduct can contact the CACI Hotline: 1-800-928-3505 (available 24 hours).