

Doing **Business**

with

General Dynamics Information Technology



GENERAL DYNAMICS
Information Technology

Introduction

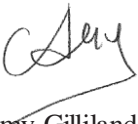
At General Dynamics Information Technology, business relationships with our partners, suppliers and vendors contribute significantly to the strength of our business. These relationships are based on a mutual commitment to the highest standards of ethical behavior.

We serve many different customers around the world and what unites us is our shared values. These values of Honesty, Transparency, Trust and Alignment ensure we treat all of our stakeholders with integrity and respect.

The values and enclosed business standards we are committed to upholding are the same principles to which we expect your company and employees to adhere to when doing business with General Dynamics. These practices underpin our success by protecting and building upon our reputation for ethical conduct built over our company's history.

In every interaction, your behavior is a serious responsibility and a key part of delivering upon our promises to all of our stakeholders.

Working together, I know we will accomplish great things.



Amy Gilliland, President
General Dynamics Information Technology



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Mutual Respect

In order to benefit from a successful business relationship with our vendors, we need also respect our vendors' employees.

Similarly, we expect our vendors to treat our employees with a level of professionalism and respect in all business dealings. Observance of the following principles will ensure a workplace free from improper and offensive conduct.



Harassment/Discrimination

Neither harassment nor discrimination is tolerated by General Dynamics. We believe each employee, regardless of race, color, religion, national origin, age, gender, sexual orientation, or physical/mental disability, is a valuable, respected employee. Any vendor doing business with General Dynamics shall not engage in any type of harassment and/or discrimination in any form against any General Dynamics employee. Similarly, all General Dynamics employees shall not harass or discriminate against co-workers, business partners or customers.

Equal Employment Opportunities

General Dynamics is strongly committed to a positive work environment in which all individuals may grow, contribute and participate free from discrimination. We are committed to legally compliant policies and practices in all aspects of employment, including: recruiting, hiring, evaluation, training, discipline, work and service assignments, career development, compensation, promotion, and termination. We expect

Mutual Respect (continued)

our vendors to treat equally both General Dynamics employees and their own, regardless of race, color, sex, national origin, age, gender, religion, disability, sexual orientation, genetic information or any other protected status under applicable federal, state or local laws.

Drug-Free Workplace

General Dynamics maintains a workplace free from the effects of drug abuse. We do not tolerate any use of illegal drugs or abuse of controlled substances while vendors are engaged in General Dynamics' business, or while working at a General Dynamics company location. We expect our vendors to similarly maintain the same type of drug-free environment, and hold its employees to the same high standards.

Workplace Violence

General Dynamics does not tolerate violent behavior in the workplace, whether committed by or against our employees. We prohibit the following behavior: making threatening remarks; causing physical injury to someone else; intentionally damaging someone else's property; or acting aggressively in a way that causes someone else to fear injury.

Vendors should be aware that any questionable behavior on their part, or by their employees that could be construed as dangerous or violent, is unacceptable and not tolerated. Such behavior should be reported to a General Dynamics site supervisor, manager, Human Resources representative, or Security Officer and may result in either removal of your employee, or termination of our business relationship.



Gifts & Gratuities

General Dynamics competes solely on the basis of the value and merits of its products and services and on its reputation for honesty, fairness and integrity. General Dynamics employees are prohibited from offering or giving any item of value to a current or prospective customer in an attempt to improperly influence a contract award decision or other favorable customer action. We expect our vendors to adhere to the same prohibitions.

Meals and Entertainment

General Dynamics employees are permitted to provide for entertainment and business meals for domestic and foreign commercial customers and suppliers, so long as such payments are reasonable, infrequent, business-related, do not violate the recipient's policies, and comply with applicable laws and regulations, and General Dynamics' expense reporting requirements. We expect our vendors to adhere to these same principals when conducting business with General Dynamics.



Gifts & Gratuities (continued)

Other Items of Value

Other items of value may be offered or given to U.S. or foreign commercial prospective or current customers, subcontractors, and vendors:

- If the value of such an item is reasonable (\$100 or less) and it is otherwise permissible for the recipient to accept such an item.
- If the value of such an item is greater than set forth in the previous paragraph, prior written approval must be obtained from the General Dynamics IT Ethics Officer.

Under no circumstances shall a General Dynamics IT employee offer, give, solicit or accept cash or any cash/investment interest in any amount, to or from any customer, subcontractor or vendor.

Foreign Gifts

General Dynamics' policy is to discourage receipt of gifts in the international marketplace. Unsolicited gifts of moderate value and business meals offered by international customers and vendors may generally be accepted by General Dynamics employees. Tangible gifts with a value of \$100 or greater presented to a General Dynamics employee must be promptly reported to the General Dynamics IT Ethics Officer for proper disposition.

The U.S. Foreign Corrupt Practices Act prohibits giving or offering money or anything of value, to a foreign government official, foreign government party or party official, or any candidate for a foreign political office for the purpose of obtaining, retaining, or directing business.

Gifts & Gratuities (continued)

Gifts to U.S. Government Officials

The rules on offering or giving gifts to U.S. Government officials are significantly more stringent than gifts to commercial customers. Vendors should understand that General Dynamics employees (and others acting on behalf of the company) are strictly prohibited from offering or giving any gift or other item of monetary value (with limited exceptions, such as individual gifts less than \$20 in value and less than \$50 annually) to a Government official with whom the company conducts business.



It is General Dynamics' unwavering policy to avoid any appearance of impropriety with Government officials. Instead, we rely on our strong performance and service offerings as justification for receiving business from Government agencies.

Bribes and Kickbacks

General Dynamics employees must never offer, give, solicit, or accept any form of bribe or kickback. We expect our vendors to adhere to these strict prohibitions as well when conducting business with General Dynamics. A bribe or kickback is the giving or accepting of money, fees, commissions, credits, gifts, favors, or anything of value either directly or indirectly provided in return for favorable treatment. Favorable treatment often can appear innocent, but is illegal when offered in exchange for a gift.

All vendors working for or on behalf of General Dynamics must adhere to the requirements of the Anti-Kickback Act of 1986 and Federal

Gifts & Gratuities (continued)

Acquisition Regulation (FAR) 52.203-7. Some important aspects of these requirements are:

- All vendors are strictly prohibited from attempting to offer, provide, solicit, or accept or from offering, providing, soliciting, or accepting any kickbacks to or from any prime contractor, subcontractor or employee of either;
- General Dynamics shall not directly or indirectly include the amount of any kickback in any price charged to the United States Government;
- General Dynamics shall maintain and follow procedures designed to prevent and detect possible violations of the Anti-Kickback Act of 1986 in its operations and direct business relationships;

Any vendor who has reasonable grounds to believe that there has been a violation of the Anti-Kickback Act shall promptly report the possible violation to the General Dynamics Information Technology Legal Department, which may be required to disclose such kickbacks to the appropriate Government authorities.

In addition, the U.S. Foreign Corrupt Practices Act, the U.K. Bribery Act and other anti-bribery laws apply to business dealings with overseas vendors and customers.



Conflicts of Interest

A conflict of interest occurs when your private interests interfere or appear to interfere with the interests of General Dynamics. Your company should base its business decisions on our company's needs, rather than on the personal interests of your employees, the interests of family or friends, or any other reason that creates a conflict which could impact either party's objectivity. In this regard, be aware that any personal business relationships that you or your company may have with an employee, supplier, customer or competitor of General Dynamics should never influence the decisions you make on behalf of our company. It is critically important that we avoid even the appearance of a conflict between your personal interests and those of General Dynamics.

In your capacity as a vendor supporting General Dynamics, if you are required to gather information about our competitors, only gather such information from public sources freely available to others. Never spy or steal in order to obtain competitive information on our behalf. Never obtain proprietary or confidential information of your company or a third party to General Dynamics and its employees, unless pursuant to an executed confidentiality agreement.



Adherence To Contractual & Legal Requirements

General Dynamics is committed to delivering goods and services as promised within budget and on time. We never substitute material, change testing or alter quality control requirements except in accordance with applicable customer procedures. We never certify that something has either been tested or performed when it has not.

As a company doing business with General Dynamics, you are expected to adhere to the following responsibilities:

- Do not make substitutions of products or materials without following applicable customer procedures;
- Perform all required tests in accordance with the terms of the applicable contract/agreement;
- Provide accurate and honest invoices/claims. It is your responsibility to submit your time and expenses promptly and accurately. In addition to any actions that your company or the customer may take, should General Dynamics discover mischarging, product substitution, or any material misrepresentation, fraud or contractual deviation committed by one of its vendors, it will seek to enforce all available remedial measures, including but not limited to termination of our business relationship.



Adherence To Contractual & Legal Requirements (continued)

Export/Import Compliance

Export and import compliance is an important national priority. Various laws regulate the export, re-export and import of certain products and information in order to protect national security and further foreign policy interests of the United States. General Dynamics is serious in its commitment to export/import compliance and enforcement of its export/import compliance policy and expects its vendors to be cognizant of such requirements.

If your company conducts business for General Dynamics in international markets, you must ensure that such transactions are conducted properly and in accordance with U.S. Trade Controls and General Dynamics' policy.

There are various export/import violations that carry severe penalties. Be aware of the following violations that make it unlawful to:

- Export or attempt to export from the U.S. or to re-export any defense article or technical data, or to furnish any defense service without first obtaining the required license or written approval from the Department of State.
- Export or attempt to export from the U.S. or to re-export any commercial or dual-use item without an appropriate license or other authorization from the Department of Commerce.
- Import or attempt to import any defense article without first obtaining the required authorization.
- Violate any of the terms or conditions of licenses or approvals granted by the Departments of State or Commerce (“limitations and provisos”).

Adherence To Contractual & Legal Requirements (continued)

- Make a false statement, misrepresent or omit a material fact in a license application or other export document.
- Export or re-export to an unauthorized foreign national or consignee.
- Hand-carry technical data or hardware overseas without appropriate authorization and documentation.
- Transmit technical data electronically (by fax, e-mail, telephone, internet, intranet, etc.) to foreign persons or General Dynamics employees overseas without appropriate export control authorization.
- Deal with any entity listed by the U.S. government as a prohibited or restricted party.

Due to the severe consequences of non-compliance with U.S. government export/import regulations, any company doing business with General Dynamics who fails to comply with these regulations will be subject to termination of our business relationship.



Adherence To Contractual & Legal Requirements (continued)

Anti-Human Trafficking Policy

General Dynamics is vigilant in preventing human rights violations. This is reflected in our corporation's ethos—with our commitment to respecting the dignity, rights and autonomy of others—and reinforced through employment, ethics and procurement policies designed to ensure protection against human rights abuses, including human trafficking. Like our U.S. Government, General Dynamics maintains a “zero tolerance” policy prohibiting human trafficking, including the prohibitions set forth in Federal Acquisition Regulation (FAR) Subpart 15. and the contract clause at FAR 52.222-50. These regulations prohibit:

- Severe forms of human trafficking, such as (a) sex trafficking (where commercial sex acts are induced by force, fraud or coercion and the victim is under 18 years old) or, (b) the recruitment, harboring, transportation, provision or obtaining of a person for labor/services through the use of fraud, force or coercion and involuntary servitude, peonage, debt bondage or slavery;
- Procuring a commercial sex act during the period of performance of a Government contract;
- Use of forced labor during the course of performing a Government contract;
- Destruction, concealment, confiscation or denial of access to an employee's immigration documentation (i.e., driver's license, passport, VISA, etc.);

Adherence To Contractual & Legal Requirements (continued)

- Use of misleading/fraudulent practices when recruiting or hiring employees, including the requirement to pay a “recruitment fee.” Offer and assignment letters must specify the basic terms of employment (wages, benefits, travel, housing, hazardous nature of work) and must be provided to the employee in writing and in a language that they understand;
- Housing that fails to meet local safety/housing standards; and
- If you are supporting a U.S. Government contract, there are requirements to disclose any potential human trafficking violation to the contracting officer and the applicable agency Inspector General. You must also ensure to protect any employee believed to be victims of, or witnesses, to prohibited human trafficking activities. Any potential human trafficking violations that affect a General Dynamics U.S. Government contract, should also be reported promptly to the company’s Anti-Trafficking Compliance Officer (Ryan Brown) at ryan.brown@gdit.com, or at 703-995-3725.



Commitment To Quality

General Dynamics is committed to providing the best value products and services to our customers by complying with requirements and through the attainment of quality goals and the continual improvement of our business processes. In order to produce these products and services, General Dynamics maintains certain quality standards explained below.

International Organization for Standardization (ISO)

General Dynamics Information Technology is proud of its ISO 9001 registration and committed to maintaining the high standards that this registration demands. This registration provides indisputable evidence that our Quality Management System (QMS) conforms to the internationally recognized ISO 9001 Standard. ISO 9001 registration is important since the U.S. Government has been moving toward adopting this standard and phasing out Federal and DoD standards. In addition, many U.S. and international companies only do business with other ISO-registered companies. ISO 9001 standardizes the process and procedures we use, and the manner in which we keep records. ISO 9001 registration means that our processes and commitment to quality has been validated.

Under ISO, all programs and locations are subject to audit. The audits verify the ability to prove compliance with our QMS and the ISO Standard. The ISO Registrar conducts external audits and internal audits are conducted by qualified internal auditors. Vendors working on site at General Dynamics business units need to be aware that General Dynamics IT is ISO 9001 registered and that audits occur periodically.

Commitment To Quality (continued)

Environmental, Health & Safety Policy (EHS)

General Dynamics is committed to developing, implementing, and maintaining effective safety programs and procedures to safeguard personnel, facilities, and the environment at all company locations. General Dynamics establishes effective procedures for the protection of employees, contractors, vendors and other visitors and provides safety assistance and guidance to ensure compliance with relevant legislation and regulations by utilizing measurable objectives and targets designed to promote continual improvement and to prevent pollution.

Operational control procedures are developed and maintained for situations and activities where the absence of specifically defined programs or systems can result in significant risk of personal injury, damage to the environment or noncompliance to applicable EHS governmental regulations. As a result, vendors and their employees are responsible for personal compliance with applicable EHS operational controls to the extent required by their job responsibilities. Information regarding personal compliance will be provided to all vendors working on site at General Dynamics' facilities. Such information will include:

- Assuring vendor is escorted in a company facility at all times;
- Assuring vendor has reviewed general safety information;
- Briefing vendor about any potential site-specific hazards to which they may be exposed; and
- Directing vendor to designated muster area in the event of an evacuation;

Conclusion



General Dynamics IT hopes to enjoy successful business relationships with all the companies it engages. In order that our business relationship is not jeopardized, we ask that you abide by the guidelines set forth in this pamphlet. Any questions related to this pamphlet or doing business with our company can be directed to your contractual point of contact, the General Dynamics IT Ethics Officer (703-995-3753), or to any member of the General Dynamics IT Legal Department.



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