
Supplier

Code of Conduct





We value our supplier relationships

At Valiant, we value our supplier relationships and the collective accountability we share in meeting program requirements and achieving total client satisfaction. We believe that doing business without corrupt practices is possible and we only work with suppliers and subcontractors (“suppliers”) who work with integrity and agree to operate with the standards outlined in this Supplier Code of Conduct (“the Code”).

COMPLIANCE WITH LAW

Our suppliers must comply with all applicable laws and regulations including, but not limited to those covering tax, labor, anti-trust, corruption, human trafficking, environmental, record keeping, protection of information, etc. We expect them to adhere to both the letter and spirit of the law.

ANTI-CORRUPTION

We expect our suppliers to comply with anti-corruption laws and regulations. They must prohibit the giving or receiving of any form of bribe, kickback or facilitation payment. The gifts they give and receive in connection to their business must be in compliance with law and never contingent on the actions of the recipient or giver.

ANTI-TRUST AND ANTI-COMPETITION

Our suppliers must not fix prices, divide territories, rig bids or share any pricing information with their competitors and comply with all other applicable anti-trust and anti-competition laws.

HUMAN RIGHTS

Our suppliers must respect the rights of all human beings and work to ensure their supply chains are not subject to human trafficking, child labor or other illegal or unethical labor conditions.

WORK ENVIRONMENT

We have zero tolerance for harassment and bullying in the workplace and we expect our suppliers to maintain a work environment that is free from discrimination and harassment.

They also must ensure that their employees and job applicants are treated with equality, respect and in accordance with labor laws.

Our suppliers must provide a work environment that is safe and secure. Additionally, it must be free from the use, possession or distribution of illegal drugs and the abuse of legal drugs.



CONFLICTS OF INTEREST

We expect our suppliers to avoid conflicts of interest and promptly disclose to us any actual, potential, or perceived conflicts of interest relating to the work carried out with Valiant.

PROTECTION OF INFORMATION AND DATA

Our suppliers must only use the information and data entrusted to them in compliance with the terms of the contract, ensure confidentiality and protect against unauthorized access or misuse. They are required to disclose to us any unauthorized access or misuse within 48 hours of discovery.

QUALITY

Our suppliers must provide all services and products in accordance with the agreed specification, including ensuring no counterfeit parts or materials are included in the products. They must maintain relevant certifications and immediately inform us of any lapses of these. We also expect them to disclose any incidents relating to the work carried out on our behalf.

ACCURATE RECORDS

We expect our suppliers to keep complete, accurate and fair records of their business transaction, including retaining the records for the required length of time under applicable law.

GLOBAL TRADE COMPLIANCE

Our suppliers must comply with all applicable laws and regulations governing the import, export, re-export and re-transfer of services, technical data, software and hardware. They also must comply with economic sanctions and embargoes, U.S. anti-boycott requirements or any other trade compliance laws and regulations of the U.S. and any other country in which activities are conducted.

ENVIRONMENTAL IMPACT

We expect our suppliers to comply with applicable environmental laws and regulations and work to reduce any negative environmental impacts caused by their work.



SUPPLIER DIVERSITY

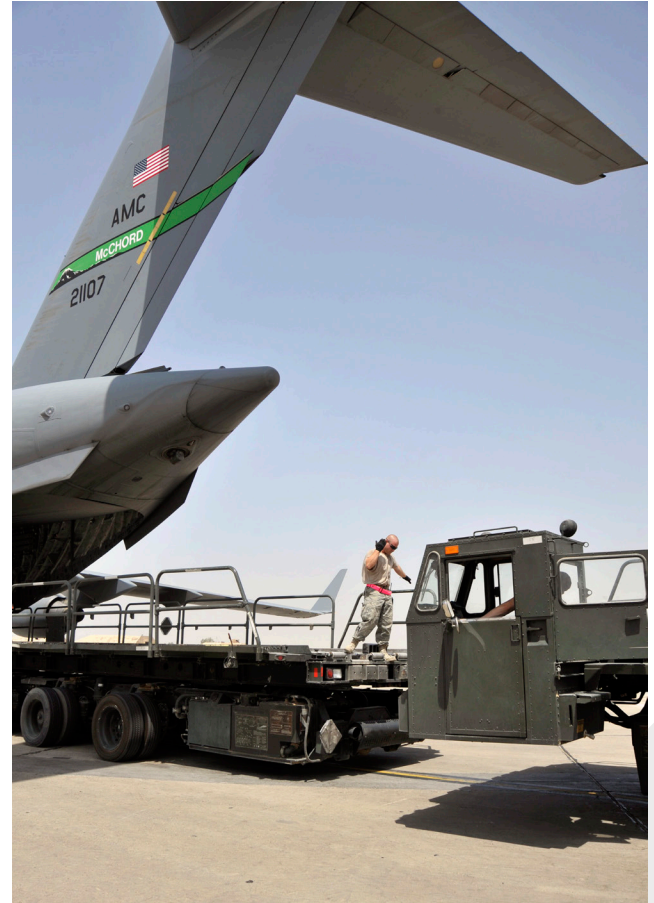
We ask our suppliers to be mindful that we actively support small businesses and often have country specific supplier inclusion goals directed by our clients. This may include small disadvantaged, woman-owned, veteran-owned, service-disabled veteran-owned, historically underutilized business zone (HUBZone) firms, as well as historically black colleges and universities/minority institutions (HBCU/MI).

RAISING CONCERNS

We expect our suppliers to provide a work environment where their employees can raise concerns without fear of retaliation.

ETHICS AND COMPLIANCE PROGRAM

As is appropriate for their size and scope of work, we expect our suppliers to have a system in place to ensure compliance with applicable laws and regulations, their contract requirements and the expectations outlined in this code. We expect them to flow down the principles and requirements of this code to their suppliers and subcontractors. We also encourage them to develop their own code of conduct, outlining what it means to work with integrity.



Violations of this Code

Valiant may take corrective action to address any violations of this code, including terminating our relationship with the supplier, in accordance with the terms of the contract or other agreement with Valiant, and reporting the violation to the appropriate authorities as necessary.

This code is not meant to conflict with or modify the contract or other agreement with Valiant. In the event of a conflict, the law or regulation will take precedence, then the terms and conditions of the contract or agreement then the requirements of this code.