



HUNTINGTON INGALLS INDUSTRIES  
Supplier Code of Conduct



## GENERAL DISCLAIMER

*This Supplier Code of Conduct is in no way intended to conflict with or modify the terms and conditions of any existing contract. In the event of a conflict, suppliers must first adhere to applicable laws and regulations, then the contract terms, followed by this Supplier Code of Conduct.*

## COMPLIANCE WITH LAWS

Huntington Ingalls Industries (“HII”) has embraced a set of values and established high ethical standards for the conduct of our business.

HII considers adherence to our [Company Values](#) and [Code of Ethics and Business Conduct](#), as well as strict observance of all U.S. and foreign laws and regulations, to be not only a legal requirement but an ethical obligation for all.

Everyone associated with HII is expected to make this commitment his/her own. This includes non-employees, such as vendors, consultants, agents, contract labor, employees of limited liability companies, joint ventures, and anyone who represents HII in any capacity – regardless of their position (collectively, herein, our “Suppliers.”). Individuals are responsible for the integrity and consequences of any actions taken on behalf of, or for the benefit of, HII.

We expect our Suppliers to maintain full compliance with all laws and regulations applicable to their business. When conducting international business, or if their primary place of business is outside the United States, Suppliers must comply with local laws and regulations, in addition to U.S. laws and regulations.

## ACCURATE RECORDS

We expect Suppliers to create and maintain accurate records, and not alter any record entry to conceal or misrepresent the underlying transaction represented by it. All records, regardless of format, made or received as evidence of a business transaction must fully and accurately represent the transaction or event being documented. When a record is no longer needed to conduct current business, records should still be retained based on the applicable retention requirements. Suppliers performing as U.S. Government contractors (whether direct or indirect) must comply with the requirements in FAR 4.703. Suppliers that are performing or fulfilling a U.S. Government role in their prescribed work must comply with the records management requirements of the relevant agency and any National Archives and Records Administration (NARA) requirements applicable to that agency.

## HUMAN RIGHTS

Suppliers must treat people with respect and dignity, encourage diversity, remain receptive to diverse opinions, promote equal opportunity for all, and foster an inclusive and ethical culture. Suppliers must refrain from violating the rights of others and address any adverse human rights impacts of their operations.

## HUMAN TRAFFICKING

Suppliers must adhere to all applicable U.S. laws and regulations prohibiting human trafficking and comply with all applicable local laws in the country or countries in which they operate. Suppliers must educate employees on prohibited human trafficking activities, discipline employees found to have violated the law

or rules, and notify the contracting officer of violations and action taken against employees. Specifically, Suppliers are prohibited from the following in all HII contracts:

- Using forced, bonded or indentured labor, slavery, or trafficking of persons;
- Destroying, concealing, or confiscating identity or immigration documents;
- Using misleading or fraudulent tactics in recruiting;
- Charging employee recruitment fees or providing inadequate housing based on local standards, laws and directives;
- Failing to provide employment contracts and other documentation in the employee's native language;
- Failing to provide return transportation upon the end of employment for employees brought to the country for the purpose of working on a U.S. government contract or subcontract;
- Failing to interview and protect employees suspected of being trafficking victims; and
- Hiring prostitutes or other sex workers or engaging in any other activity that contributes to trafficking in persons.

## EMPLOYMENT PRACTICES

### **Harassment**

Suppliers must maintain an employment environment that is free from physical, psychological and verbal harassment, or other abusive conduct.

### **Non-discrimination**

Suppliers must provide equal employment opportunity to employees and applicants for employment, without regard to race, ethnicity, religion, color, sex, national origin, age, military veteran status, ancestry, sexual orientation, gender identity or expression, marital status, family structure, genetic information, or mental or physical disability, so long as the essential functions of the job can be competently performed with or without reasonable accommodation.

### **Substance Abuse**

Suppliers must maintain a workplace free from illegal use, possession, sale, or distribution of controlled substances.

## ANTI-CORRUPTION

Suppliers must comply with all anti-corruption laws, directives and/or regulations applicable to their operations and activities, such as the U.S. Foreign Corrupt Practices Act, the U.K. Bribery Act and other similar laws and regulations.

### **Improper Payments**

Suppliers shall not offer, make, or accept, directly or indirectly, any improper payments of money or anything of value to or from government officials, political parties, candidates for public office, or any other individuals or entities, in order to obtain or retain business, or to award or maintain business. This includes a prohibition on facilitating payments intended to expedite or secure performance of a routine governmental action like obtaining a visa or customs clearance, even in locations where such activity may not violate local law. Personal safety payments may be permitted in circumstances where there is an imminent threat to health or safety.

### **Due Diligence**

We expect our Suppliers to exert due diligence to prevent and detect corruption in all business arrangements, including partnerships, joint ventures, offset agreements, and the hiring of consultants.

### **Gifts/Business Courtesies**

Suppliers must compete on the merits of their products and services. The exchange of business courtesies may not be used to gain an unfair competitive advantage. In any business relationship, our Suppliers must ensure that the offering or receipt of any gift or business courtesy is permitted by law and regulation, and that these exchanges do not violate the rules and standards of the recipient's organization, and are consistent with reasonable marketplace customs and practices.

## **INSIDER TRADING**

Suppliers and their personnel must not use material non-public information obtained in the course of their business relationship with HII as the basis for trading or for enabling others to trade in the securities of HII or those of any other company.

## **ANTI-TRUST & FAIR COMPETITION**

Suppliers must adhere to all applicable antitrust and competition laws and regulations. In particular, Suppliers must not fix prices or rig bids with their competitors. They must not exchange current, recent, or future pricing information with competitors, must not participate in cartels, and must not engage in any other conduct that unlawfully restrains competition.

## **CONFLICTS OF INTEREST**

Suppliers must avoid all conflicts of interest and situations giving the appearance of a conflict of interest in their dealing with HII. Suppliers must notify all affected parties in the event that an actual or potential conflict of interest arises.

## **INFORMATION PROTECTION**

We expect our Suppliers to properly handle sensitive information, including confidential, proprietary, and personal information. Information should not be used for any purposes (e.g. advertisement, publicity, and the like) other than the business purposes for which it was provided, unless there is prior authorization from the owner of the information. For sensitive information that is transmitted electronically, Suppliers are expected to implement appropriate cybersecurity controls.

We expect our Suppliers to respect and comply with all the laws governing intellectual property rights, assertions, including protection against disclosure, patents, copyrights, and trademarks.

## **ENVIRONMENT, HEALTH AND SAFETY**

Suppliers must operate in a manner that actively manages risk, conserves natural resources, and protects the environment. We expect our Suppliers to apply environmental management system principles in order to establish a systematic approach to the management of risks/hazards and opportunities associated with the environment, including potential risk of regulatory non-compliance, reputational loss, and opportunities for business growth through operational and product stewardship.

Suppliers must comply with all applicable environmental, health and safety laws, regulations, and directives. Suppliers must take reasonable efforts to protect the health, safety, and welfare of their people, visitors, and others who may be affected by their activities.

## GLOBAL TRADE COMPLIANCE

### **Security**

When applicable, Suppliers are encouraged to implement practices and procedures to ensure the security of their supply chains in accordance with the Customs-Trade Partnership Against Terrorism initiative of the United States Department of Homeland Security.

### **Import**

Suppliers must ensure that their business practices are in accordance with all applicable laws, directives and regulations governing the import of parts, components, systems, equipment, software, and technical data.

### **Export**

Suppliers must ensure that their business practices are in accordance with all applicable laws, directives and regulations governing the export of parts, components, systems, equipment, software, technical data, and provision of services to foreign persons.

### **Anti-Boycott**

Suppliers must not participate in, cooperate with, or further the cause of any unsanctioned foreign economic boycott, in accordance with the 1977 Export Administration Act and the 1976 Tax Reform Act.

## QUALITY

Suppliers must take due care to ensure their work product meets HII's quality standards. We expect our Suppliers to have in place quality assurance processes to identify defects and implement corrective actions, and to facilitate the delivery of quality products that meet or exceed the contract requirements.

Suppliers must develop, implement and maintain effective product-specific methods and processes to minimize the risk of introducing counterfeit parts and materials into deliverable products. Effective processes should be in place to detect counterfeit parts and materials, provide notification to recipients of counterfeit product(s) when warranted, and exclude them from the delivered product.

## RESOURCES

HII resources including time, property, information, and services should be used only for authorized business purposes.

- Correct charging of time helps determine how employees are paid, customers are billed, costs are estimated for new work, contract costs are allocated, and performance is reported.
- Time records submitted must be accurate. Misrepresenting time worked is prohibited. Intentionally charging time to the wrong contract or account is mischarging. Expenses must be documented accurately, adequately, and submitted promptly.
- Property, especially electronic media, should never be used for purposes which are disruptive or considered offensive.
- Information is an asset as valuable as money. We do not seek information to which we are not entitled, especially sensitive procurement information, nor will we violate copyrights or licensing agreements. HII information may not be used for personal gain and classified information must be handled and safeguarded in strict compliance with Security procedures.
- Anyone acting on HII's behalf is strictly prohibited from circumventing HII's system of internal controls or providing misleading information on HII documents.

## ETHICS PROGRAM EXPECTATIONS

### **Whistleblower Protection**

Suppliers must provide their employees with avenues for raising legal or ethical issues or concerns without fear of retaliation. We expect our Suppliers to take action to prevent, detect, and correct any retaliatory actions.

### **Ethics Policies**

Commensurate with the size and nature of their business, we expect our Suppliers to have management systems in place to support compliance with laws, regulations, and the requirements and expectations set forth in this Supplier Code of Conduct. We encourage our Suppliers to implement their own written code of conduct and to flow down the principles of any such code of conduct to the entities that furnish them with goods and services.

## VIOLATIONS

In the event of a violation of any of the above expectations, HII may pursue corrective actions to remedy the situation. In the case of a violation of law or regulation, HII may be required to report those violations to proper authorities. We reserve the right to terminate our relationship with any Supplier under the terms of the existing procurement/purchasing contract.

## HUNTINGTON INGALLS INDUSTRIES VALUES

We, the people of Huntington Ingalls Industries, are guided by the following Values. They describe our company as we want it to be. We want our decisions and actions to demonstrate these Values. We believe that putting our Values into practice creates long-term benefits for shareholders, customers, employees, suppliers, and the communities we serve.

At Huntington Ingalls Industries, we value:



### INTEGRITY

Integrity is at the heart of who we are and what we do. We are each personally accountable for the highest standards of ethics and integrity. We will fulfill our commitments as responsible citizens and employees. We will consistently treat customers, suppliers and company resources with the respect they deserve. We are committed to being honest and fair with our customers, our employees, our stockholders and each other. We will be truthful, trustworthy and honorable in all aspects of our work. We will always do the right thing even when it may be difficult.



### SAFETY

We value our employees above all else and will not compromise on maintaining a safe and healthy work environment for them. We expect everyone to actively participate and take responsibility for their own safety and the safety of those around them. Employees can report safety concerns without fear of reprisal and are empowered to stop work if an operation presents significant risk or danger. We continuously evaluate and improve our operations to understand and mitigate risk.



### RESPECT

We value people, knowing we must show fairness and equal treatment for all. We will continuously build a collaborative culture of inclusion where treating each other with empathy, dignity and compassion is the expected behavior. We do this by actively listening to all perspectives and treating everyone in a courteous and professional manner.



### ENGAGEMENT

We are committed to an engaged workforce. Our employees are very involved in what they do and take ownership of their work and work processes. Engagement is a heightened level of ownership where employees want to do whatever they can for the benefit of their internal and external customers and for the success of the organization as a whole.



### RESPONSIBILITY

We seek and accept personal responsibility for our actions and results. We keep promises and commitments made to others. We are responsible for ensuring quality is a component of everything we do. We take pride in providing outstanding customer service.



### PERFORMANCE

We hold ourselves to a very high standard of performance. We are committed to improving our company performance while upholding our strong values. We always perform in a way that is aligned with our values and procedures, because meeting a performance goal is never justification for unethical behavior. Superior performance and quality ensure future trust and confidence in our products and services. We promote continuous improvement, innovation and creativity.

### **HII OpenLine**

Anonymous and Confidential, 24/7

**Toll-free 1-877-631-0020**

The Huntington Ingalls Industries OpenLine is available to anyone affiliated with Huntington Ingalls Industries and is administered by an independent third party provider. Individuals can seek guidance or report a suspected violation of our Code of Ethics and Business Conduct.

### **Web Reporting**

### **HII Ethics Website**

This website provides information about Huntington Ingalls Industries Values and Code of Ethics and Business Conduct.

