

DEFENCE COMPANIES INDEX (DCI) ON ANTI-CORRUPTION AND CORPORATE TRANSPARENCY 2020

FINAL ASSESSMENT

PERSPECTA INC.

The following pages contain the detailed scoring for this company based on publicly available information.

The table below shows a summary of the company's scores per section:

Section	Number of Questions*	Score Based on Publicly Available Information
1. Leadership and Organisational Culture	4	5/8
2. Internal Controls	6	3/12
3. Support to Employees	7	3/14
4. Conflict of Interest	4	4/8
5. Customer Engagement	7	1/14
6. Supply Chain Management	5	3/10
7. Agents, Intermediaries and Joint Ventures	10	1/20
8. Offsets	4	0/8
9. High Risk Markets	4	3/8
10. State-Owned Enterprises	0	N/A
TOTAL		23/102
BAND		E

*This column represents the number of questions on which the company was eligible to receive a score; i.e. where the company did not receive a score of N/A.

1. Leadership and Organisational Culture

Question
1.1. Does the company have a publicly stated anti-bribery and corruption commitment, which is authorised by its leadership?
Score
1
Comments
<p>The company's code of conduct details the company's stance against bribery and corruption. It is clear that this document was authorised and endorsed by the company's leadership.</p> <p>However, the messages from leadership do not specifically mention anti-bribery and corruption and therefore a score of '1' applies.</p>
Evidence
<p>[1] The Standard (Document) Accessed on 14/08/2019 https://perspecta.com/sites/default/files/2019-07/perspecta_CoC_layout_Digital_040219.pdf [p.4] June 2018</p> <p>Colleagues:</p> <p>It's a pleasure to introduce you to Perspecta's code of conduct, The Standard. The Standard plays a critical role in the implementation of our mission and most prominently our values by outlining concrete behaviors that are expected from us all.</p> <p>Following the core values defined here demonstrates that we are all striving to be the best in everything we do and helps bring these corporate statements to life. These statements are more than merely words on a page – they are a call to action that guides everything we do.</p> <p>As our values make clear, each of us is expected to be a steward of the highest ethical standards. Yet demonstration of ethical behavior on an organizational scale is neither accidental nor unintentional. Ethical behavior is a deliberate and purposeful selflessness that respects others while building strong interpersonal relationships. If we each internalize the guidelines presented on the following pages, we will build a strong sense of culture that will define who we are as a company and help further distance Perspecta from our competitors.</p> <p>Mac Curtis</p> <p>President and Chief Executive Officer Perspecta Inc.</p> <p>[p.7] Message from the Chief Ethics and Compliance Officer</p> <p>Sarah Lynn</p> <p>Perspecta/ Chief Ethics and Compliance Officer</p> <p>At Perspecta, our core values drive our behavior every day whether it be delivering exemplary services to our customers or acting with respect and integrity when interacting with our peers and partners. As a government contractor, compliant and ethical behavior is in our DNA. In helping to achieve our customers' missions, we want to be known as a company that does the right thing and makes the right decisions. This means understanding our compliance policies and procedures and raising concerns when necessary.</p> <p>Ethics issues and concerns can be reported in a variety of ways, including anonymously through our ethics helpline. All concerns raised will be treated confidentially and we will never retaliate against any employee who speaks up</p>

honestly and in good faith. We expect our employees to behave with integrity, and will hold them accountable if we find misconduct.

Our code of conduct, The Standard, as well as supporting policies, guidance documents and related training, provide the framework for employees to meet Perspecta's expectations in performing work for the company. If you find yourself in a situation where you do not know what to do, reach out for guidance. Your leadership, the office of general counsel, human resources, security and the ethics and compliance team are available to provide answers.

As Perspecta employees, we are all responsible for understanding and complying with The Standard, applicable laws, government regulations and Perspecta policies related to our jobs. In fulfilling these responsibilities, each of us must:

- Read, understand, and comply with The Standard and Perspecta policies related to our job
- Participate in training and educational programs/events required for our job
- Obtain guidance for resolving a business practice or compliance concern if we are uncertain about how to proceed in a certain situation
- Report possible violations of The Standard, policies, applicable laws and regulatory requirements through our established channels
- Cooperate fully in any investigation
- Make a commitment to conduct Perspecta business with integrity and in compliance with applicable laws and regulatory requirements

Sarah Lynn

[p.12] Anti-corruption

You must strictly comply with the anti-corruption laws that govern our operations in the countries in which we do business. Such laws include the U.S. Foreign Corrupt Practices Act (FCPA) and similar laws enacted by other countries. Generally, these laws prohibit bribery, directly or indirectly, of foreign government officials, political parties or candidates to obtain some improper business advantage. More specifically, they prohibit you, directly or indirectly, from corruptly giving, offering, or promising anything of value to foreign officials or foreign political parties, officials or candidates, for the purpose of influencing them to misuse their official capacity to obtain, keep or direct business or to gain any improper advantage. In addition, to prevent concealment of bribery, the FCPA prohibits knowingly falsifying a company's books and records, or knowingly circumventing or failing to implement adequate internal accounting controls.

Question
<p>1.2. Does the company have a comprehensive anti-bribery and corruption policy that explicitly applies to both of the following categories:</p> <p>a) All employees, including staff and leadership of subsidiaries and other controlled entities;</p> <p>b) All board members, including non-executive directors.</p>
Score
1
Comments
<p>The company publishes an anti-bribery and corruption policy which makes specific reference to the prohibition of bribery, payments to public officials and commercial bribery. There is evidence that this policy applies to all employees and board members of the company.</p> <p>However, the company scores '1' as there is no evidence its policy prohibits facilitation payments. The company's policy also does not extend beyond a general commitment to comply with anti-bribery laws.</p>
Evidence
<p>[1] The Standard (Document) Accessed on 14/08/2019 https://perspecta.com/sites/default/files/2019-07/perspecta_CoC_layout_Digital_040219.pdf</p> <p>[p.9] Our code of conduct provides the ethical guidelines and expectations for conducting business on behalf of Perspecta. All employees and members of the Perspecta Board of Directors, as well as consultants or others representing Perspecta, are expected to act in ways consistent with The Standard.</p> <p>[p.12] Anti-corruption You must strictly comply with the anti-corruption laws that govern our operations in the countries in which we do business. Such laws include the U.S. Foreign Corrupt Practices Act (FCPA) and similar laws enacted by other countries. Generally, these laws prohibit bribery, directly or indirectly, of foreign government officials, political parties or candidates to obtain some improper business advantage. More specifically, they prohibit you, directly or indirectly, from corruptly giving, offering, or promising anything of value to foreign officials or foreign political parties, officials or candidates, for the purpose of influencing them to misuse their official capacity to obtain, keep or direct business or to gain any improper advantage. In addition, to prevent concealment of bribery, the FCPA prohibits knowingly falsifying a company's books and records, or knowingly circumventing or failing to implement adequate internal accounting controls.</p>

Question
1.3. Does the board or a dedicated board committee provide oversight of the company's anti-bribery and corruption programme?
Score
1
Comments
<p>There is evidence that a designated board committee, the Audit Committee, is ultimately responsible for the oversight of the company's ethics programme. This includes reviewing reports from management on the programme's performance on at least an annual basis.</p> <p>However, the company scores '1' as there is insufficient publicly available evidence that the Audit Committee reviews audits of the company's ethics programme specifically. The Audit Committee Charter also does not refer to anti-bribery and corruption directly.</p>
Evidence
<p>[2] Audit Committee Charter (Document) Accessed 03/04/2020 https://investors.perspecta.com/Cache/IRCache/9294427b-861d-5afa-4326-97246fcac1e8.PDF?O=PDF&T=&Y=&D=&FID=9294427b-861d-5afa-4326-97246fcac1e8&iid=10418483</p> <p>[p.3] (4) The Committee shall establish and oversee procedures for handling reports of potential misconduct, including: (a) violations of law or the Company's Code of Ethics and Standards of Conduct, (b) complaints received by the Company regarding accounting, internal accounting controls, auditing and federal securities law matters, and (c) complaints regarding accounting, internal accounting controls, auditing and federal securities law matters, including any confidential, anonymous submissions by employees of the Company.</p> <p>(5) At least annually, the Committee shall obtain and review a report by the independent auditor describing: the firm's internal quality-control procedures; any material issues raised by the most recent internal quality-control review, or peer review, of the firm, or by any inquiry or investigation by governmental or professional authorities, within the preceding five years, respecting one or more independent audits carried out by the firm, and any steps taken to deal with any such issues.</p> <p>[p.5] (19) The Committee shall oversee the Company's compliance program with respect to legal and regulatory requirements, including the Company's Code of Ethics and Standards of Conduct and the Company's policies and procedures for monitoring compliance; and at least annually, meet to review the implementation and effectiveness of the Company's compliance program with the Chief Ethics and Compliance Officer who shall have the authority to communicate directly to the Audit Committee, promptly, about actual and alleged violations of law or the Company's Code of Ethics and Standards of Conduct, including any matters involving criminal or potential criminal conduct.</p> <p>[1] The Standard (Document) Accessed on 14/08/2019 https://perspecta.com/sites/default/files/2019-07/perspecta_CoC_layout_Digital_040219.pdf</p> <p>[p.9] The ethics and compliance office (ECO) serves as an independent resource for information, advice and resolution of problems and issues.</p> <p>[p.18] Perspecta's ECO affirms and emphasizes our commitment to ethical conduct. Perspecta's chief of ethics and compliance reports directly to the general counsel, periodically provides reports to the Perspecta Board of Directors and oversees a vigorous company- wide program to promote a positive, inclusive and ethical work environment for all employees. The ECO maintains the confidential Perspecta ethics helpline and is also responsible for conducting investigations into alleged violations of The Standard or other Perspecta policies.</p>

Question
1.4. Is responsibility for implementing and managing the company's anti-bribery and corruption programme ultimately assigned to a senior executive, and does he or she have a direct reporting line to the board or board committee providing oversight of the company's programme?
Score
2
Comments
<p>There is evidence that a designated senior executive, the Chief Ethics and Compliance Officer, has ultimate responsibility for implementing and managing the company's ethics programme. It is clear that this person has a direct reporting line to the Audit Committee which provides oversight of the company's ethics programme. There is evidence of reporting and feedback activities between this person and the Audit Committee as part of the company's reporting structure.</p>
Evidence
<p>[1] The Standard (Document) Accessed on 14/08/2019 https://perspecta.com/sites/default/files/2019-07/perspecta_CoC_layout_Digital_040219.pdf [p.18] Perspecta's ECO affirms and emphasizes our commitment to ethical conduct. Perspecta's chief of ethics and compliance reports directly to the general counsel, periodically provides reports to the Perspecta Board of Directors and oversees a vigorous company- wide program to promote a positive, inclusive and ethical work environment for all employees. The ECO maintains the confidential Perspecta ethics helpline and is also responsible for conducting investigations into alleged violations of The Standard or other Perspecta policies.</p> <p>[2] Audit Committee Charter (Document) Accessed 03/04/2020 https://investors.perspecta.com/Cache/IRCache/9294427b-861d-5afa-4326-97246fcac1e8.PDF?O=PDF&T=&Y=&D=&FID=9294427b-861d-5afa-4326-97246fcac1e8&iid=10418483 [p.3] (4) The Committee shall establish and oversee procedures for handling reports of potential misconduct, including: (a) violations of law or the Company's Code of Ethics and Standards of Conduct, (b) complaints received by the Company regarding accounting, internal accounting controls, auditing and federal securities law matters, and (c) complaints regarding accounting, internal accounting controls, auditing and federal securities law matters, including any confidential, anonymous submissions by employees of the Company.</p> <p>(5) At least annually, the Committee shall obtain and review a report by the independent auditor describing: the firm's internal quality-control procedures; any material issues raised by the most recent internal quality-control review, or peer review, of the firm, or by any inquiry or investigation by governmental or professional authorities, within the preceding five years, respecting one or more independent audits carried out by the firm, and any steps taken to deal with any such issues.</p> <p>[p.5] (19) The Committee shall oversee the Company's compliance program with respect to legal and regulatory requirements, including the Company's Code of Ethics and Standards of Conduct and the Company's policies and procedures for monitoring compliance; and at least annually, meet to review the implementation and effectiveness of the Company's compliance program with the Chief Ethics and Compliance Officer who shall have the authority to communicate directly to the Audit Committee, promptly, about actual and alleged violations of law or the Company's Code of Ethics and Standards of Conduct, including any matters involving criminal or potential criminal conduct.</p>

2. Internal Controls

Question
2.1. Is the design and implementation of the anti-bribery and corruption programme tailored to the company based on an assessment of the corruption and bribery risks it faces?
Score
0
Comments
There is no clear evidence that the company has a formal risk assessment procedure which is used to inform the company's anti-bribery and corruption programme.
Evidence
<p>[2] Audit Committee Charter (Document) Accessed 03/04/2020 https://investors.perspecta.com/Cache/IRCache/9294427b-861d-5afa-4326-97246fcac1e8.PDF?O=PDF&T=&Y=&D=&FID=9294427b-861d-5afa-4326-97246fcac1e8&iid=10418483 [p.10] The Committee shall discuss the Company's policies with respect to risk assessment and risk management, and risks related to matters including the Company's financial statements and financial reporting processes, compliance, information security and cybersecurity.</p>

Question
2.2. Is the company's anti-bribery and corruption programme subject to regular internal or external audit, and are policies and procedures updated according to audit recommendations?
Score
0
Comments
There is evidence that the Audit Committee reviews the company's ethics and compliance programme on an annual basis. However, it does not clearly state that it audits the programme or whether the findings of its review process are used to update the programme.
Evidence
<p>[2] Audit Committee Charter (Document) Accessed 03/04/2020 https://investors.perspecta.com/Cache/IRCache/9294427b-861d-5afa-4326-97246fcac1e8.PDF?O=PDF&T=&Y=&D=&FID=9294427b-861d-5afa-4326-97246fcac1e8&iid=10418483</p> <p>[p.3] (4) The Committee shall establish and oversee procedures for handling reports of potential misconduct, including: (a) violations of law or the Company's Code of Ethics and Standards of Conduct, (b) complaints received by the Company regarding accounting, internal accounting controls, auditing and federal securities law matters, and (c) complaints regarding accounting, internal accounting controls, auditing and federal securities law matters, including any confidential, anonymous submissions by employees of the Company.</p> <p>(5) At least annually, the Committee shall obtain and review a report by the independent auditor describing: the firm's internal quality-control procedures; any material issues raised by the most recent internal quality-control review, or peer review, of the firm, or by any inquiry or investigation by governmental or professional authorities, within the preceding five years, respecting one or more independent audits carried out by the firm, and any steps taken to deal with any such issues.</p> <p>[p.5] (19) The Committee shall oversee the Company's compliance program with respect to legal and regulatory requirements, including the Company's Code of Ethics and Standards of Conduct and the Company's policies and procedures for monitoring compliance; and at least annually, meet to review the implementation and effectiveness of the Company's compliance program with the Chief Ethics and Compliance Officer who shall have the authority to communicate directly to the Audit Committee, promptly, about actual and alleged violations of law or the Company's Code of Ethics and Standards of Conduct, including any matters involving criminal or potential criminal conduct.</p>

Question
2.3. Does the company have a system for tracking, investigating and responding to bribery and corruption allegations or incidents, including those reported through whistleblowing channels?
Score
1
Comments
<p>There is evidence that the company commits to investigating incidents and that it has a procedure for documenting and handling whistleblower reports. The company's Ethics and Compliance Office is responsible for conducting investigations.</p> <p>However, the company does not publish details of its whole investigation process from receipt to final outcome, nor is there evidence that it commits to providing whistleblowers with updates on the outcome of investigations. While the company states that the Chief Ethics and Compliance Officer has the authority to provide information on investigations to the Audit Committee, there is no clear evidence that the committee receives summary information of all investigations relating to bribery and corruption incidents on a regular or annual basis.</p>
Evidence
<p>[1] The Standard (Document) Accessed on 14/08/2019 https://perspecta.com/sites/default/files/2019-07/perspecta_CoC_layout_Digital_040219.pdf [p.11] We respond truthfully and accurately to audits, investigations and legal actions</p> <p>You are required to cooperate with all internal investigations and audits. You must never destroy or alter any documents or electronic records; lie to or mislead an investigator; or obstruct the collection of information relating to an investigation, litigation or audit.</p> <p>Occasionally, as part of an investigation, legal, the ECO, human resources, or security may conduct an inspection or surveillance of Perspecta property. The reasons for such investigations include protecting Perspecta, its employees and customers against fraud and espionage, preventing the abuse of Perspecta property and other business purposes. Employee records, documents, telecommunications, voicemail, email, internet and computer systems, as well as Perspecta premises, mail, offices, furniture, equipment, employee offices, desks, file cabinets, computer files, telephone toll records and lockers, are all subject to inspection. Additionally, all packages and employee automobiles, while on Perspecta premises, are also subject to inspection without prior notice.</p> <p>To the greatest extent possible, Perspecta cooperates with government agencies responsible for investigating suspected violations of the law. You may also be required to cooperate with investigations conducted by the government. You must notify the ECO or the legal department immediately if you learn that a government or third party agency is conducting an investigation or asking for information pertaining to a suspected violation of the law.</p> <p>[p.18] About the Perspecta ethics and compliance office</p> <p>[...]</p> <p>The ECO maintains the confidential Perspecta ethics helpline and is also responsible for conducting investigations into alleged violations of The Standard or other Perspecta policies.</p> <p>[8] Perspecta Ethics Channel (Webpage) Accessed 03/04/2020 https://secure.ethicspoint.com/domain/media/en/gui/49698/index.html Perspecta is an organization with strong values of responsibility and integrity. Our <u>Code of Conduct</u>, The Standard, contains general guidelines for conducting business with the highest ethical standards.</p> <p>Perspecta is committed to an environment where open, honest communications are the expectation, not the exception. We want you to feel comfortable in approaching your supervisor or management in instances where you believe violations of policies or standards have occurred.</p>

In situations where you prefer to place an anonymous report in confidence, you are encouraged to use this helpline, hosted by a third party helpline provider, EthicsPoint. You are encouraged to submit reports relating to violations stated in our Code of Conduct, as well as asking for guidance related to policies and procedure and providing positive suggestions and stories.

The information you provide will be sent to us by EthicsPoint on a totally confidential and anonymous basis if you should choose. And in our efforts to resolve reported issues, Perspecta controls access to reported information, allowing its distribution to only those who need it to properly investigate.

Perspecta is committed to conducting a fair and thorough review of all actionable concerns, to maintaining employee confidence and confidentiality to the extent the law permits, and to protecting employee personal data, as appropriate. You have our guarantee that your comments will be heard.

[10] FAQ EthicsPoint (Document)

Accessed 03/04/2020

<https://secure.ethicspoint.com/domain/media/en/gui/49698/faq.pdf>

[p.2] Where do these reports go? Who can access them?

Reports are entered directly on the EthicsPoint secure server to prevent any possible breach in security.

EthicsPoint makes these reports available only to specific individuals within the company who are charged with evaluating the report, based on the type of violation and location of the incident. Each of these report recipients has had training in keeping these reports in the utmost confidence.

[p.5] What if I remember something important about the incident after I file the report? Or what if the company has further questions for me concerning my report?

When you file a report at the EthicsPoint Web site or through the EthicsPoint Call Center, you receive a unique user name and are asked to choose a password. You can return to the EthicsPoint system again either by Internet or telephone and access the original report to add more detail or answer questions posed by a company representative and add further information that will help resolve open issues. We strongly suggest that you return to the site in the time specified to answer company questions. You and the company now have entered into an "anonymous dialogue," where situations are not only identified, but can also be resolved, no matter how complex.

[2] Audit Committee Charter (Document)

Accessed 03/04/2020

<https://investors.perspecta.com/Cache/IRCache/9294427b-861d-5afa-4326-97246fcac1e8.PDF?O=PDF&T=&Y=&D=&FID=9294427b-861d-5afa-4326-97246fcac1e8&iid=10418483>

[p.3] (4) The Committee shall establish and oversee procedures for handling reports of potential misconduct, including: (a) violations of law or the Company's Code of Ethics and Standards of Conduct, (b) complaints received by the Company regarding accounting, internal accounting controls, auditing and federal securities law matters, and (c) complaints regarding accounting, internal accounting controls, auditing and federal securities law matters, including any confidential, anonymous submissions by employees of the Company.

[p.5] (19) The Committee shall oversee the Company's compliance program with respect to legal and regulatory requirements, including the Company's Code of Ethics and Standards of Conduct and the Company's policies and procedures for monitoring compliance; and at least annually, meet to review the implementation and effectiveness of the Company's compliance program with the Chief Ethics and Compliance Officer who shall have the authority to communicate directly to the Audit Committee, promptly, about actual and alleged violations of law or the Company's Code of Ethics and Standards of Conduct, including any matters involving criminal or potential criminal conduct.

Question
2.4. Does the company have appropriate arrangements in place to ensure the quality of investigations?
Score
1
Comments
<p>There is some evidence that the company assures itself of the quality of its internal investigations, by stating that employees with concerns about the actions or decisions of the Ethics and Compliance Office may contact the General Counsel.</p> <p>However, there is no evidence that the company assures itself of the quality of both incident investigations and whistleblowing cases, it is unclear whether all staff conducting investigations are properly trained or qualified, and there is no evidence that the company reviews its investigations procedure at least every three years or in response to any changes in the regulatory environment.</p>
Evidence
<p>[1] The Standard (Document) Accessed on 14/08/2019 https://perspecta.com/sites/default/files/2019-07/perspecta_CoC_layout_Digital_040219.pdf [p.18] About the Perspecta ethics and compliance office</p> <p>[...]</p> <p>The ECO maintains the confidential Perspecta ethics helpline and is also responsible for conducting investigations into alleged violations of The Standard or other Perspecta policies.</p> <p>You are encouraged to reach out to the ECO team whenever you have a question or concern that cannot be readily addressed within your work group or through your manager.</p> <p>If your concern relates to the actions or decisions of the Perspecta ECO, please contact the Perspecta general counsel.</p> <p>[10] FAQ EthicsPoint (Document) Accessed 03/04/2020 https://secure.ethicspoint.com/domain/media/en/gui/49698/faq.pdf [p.2] Where do these reports go? Who can access them? Reports are entered directly on the EthicsPoint secure server to prevent any possible breach in security. EthicsPoint makes these reports available only to specific individuals within the company who are charged with evaluating the report, based on the type of violation and location of the incident. Each of these report recipients has had training in keeping these reports in the utmost confidence.</p>

Question
2.5. Does the company's investigative procedure include a commitment to report material findings of bribery and corruption to the board and any criminal conduct to the relevant authorities?
Score
1
Comments
<p>There is evidence indicating that the company reports material findings of bribery and corruption to the Audit Committee, a designated board committee.</p> <p>However, there is no evidence that an appropriate senior individual is responsible for ensuring that the disclosure of criminal offences to relevant authorities is evaluated and acted upon if necessary.</p>
Evidence
<p>[1] The Standard (Document) Accessed on 14/08/2019 https://perspecta.com/sites/default/files/2019-07/perspecta_CoC_layout_Digital_040219.pdf [p.11] To the greatest extent possible, Perspecta cooperates with government agencies responsible for investigating suspected violations of the law. You may also be required to cooperate with investigations conducted by the government. You must notify the ECO or the legal department immediately if you learn that a government or third party agency is conducting an investigation or asking for information pertaining to a suspected violation of the law.</p> <p>[p.18] About the Perspecta ethics and compliance office</p> <p>At Perspecta, we want to uphold the highest standards of integrity, and we want to do more than comply with laws and regulations.</p> <p>Perspecta's ECO affirms and emphasizes our commitment to ethical conduct. Perspecta's chief of ethics and compliance reports directly to the general counsel, periodically provides reports to the Perspecta Board of Directors and oversees a vigorous companywide program to promote a positive, inclusive and ethical work environment for all employees. The ECO maintains the confidential Perspecta ethics helpline and is also responsible for conducting investigations into alleged violations of The Standard or other Perspecta policies.</p> <p>[2] Audit Committee Charter (Document) Accessed 03/04/2020 https://investors.perspecta.com/Cache/IRCache/9294427b-861d-5afa-4326-97246fcac1e8.PDF?O=PDF&T=&Y=&D=&FID=9294427b-861d-5afa-4326-97246fcac1e8&iid=10418483 [p.5] (19) The Committee shall oversee the Company's compliance program with respect to legal and regulatory requirements, including the Company's Code of Ethics and Standards of Conduct and the Company's policies and procedures for monitoring compliance; and at least annually, meet to review the implementation and effectiveness of the Company's compliance program with the Chief Ethics and Compliance Officer who shall have the authority to communicate directly to the Audit Committee, promptly, about actual and alleged violations of law or the Company's Code of Ethics and Standards of Conduct, including any matters involving criminal or potential criminal conduct.</p>

Question
2.6. Does the company publish high-level results from incident investigations and disciplinary actions against its employees?
Score
0
Comments
There is no evidence that the company publishes high-level results from incident investigations and disciplinary actions.
Evidence
No evidence found.

3. Support to Employees

Question
3.1. Does the company provide training on its anti-bribery and corruption programme to all employees across all divisions and geographies, and in all appropriate languages?
Score
0
Comments
While the company states that it provides training to its employees, there is no clear evidence that the training covers anti-bribery and corruption.
Evidence
<p>[1] The Standard (Document) Accessed on 14/08/2019 https://perspecta.com/sites/default/files/2019-07/perspecta_CoC_layout_Digital_040219.pdf [p.7] Message from the Chief Ethics and Compliance Officer</p> <p>[...]</p> <p>Our code of conduct, The Standard, as well as supporting policies, guidance documents and related training, provide the framework for employees to meet Perspecta's expectations in performing work for the company. If you find yourself in a situation where you do not know what to do, reach out for guidance. Your leadership, the office of general counsel, human resources, security and the ethics and compliance team are available to provide answers.</p> <p>As Perspecta employees, we are all responsible for understanding and complying with The Standard, applicable laws, government regulations and Perspecta policies related to our jobs. In fulfilling these responsibilities, each of us must:</p> <ul style="list-style-type: none"> • Read, understand, and comply with The Standard and Perspecta policies related to our job • Participate in training and educational programs/events required for our job <p>[p.17] We report insider threat information</p> <p>[...]</p> <p>Management commitment and employee participation are reinforced through our security education and training program, which heightens awareness and emphasizes adherence to policies regarding reportable events. It is the responsibility of all Perspecta employees to help protect our company and our information, and that when anyone sees something that is not in accordance to our core values, our ethics or our commitments to ourselves and our government customers we all need to say something.</p>

Question
<p>3.2. Does the company provide tailored training on its anti-bribery and corruption programme for at least the following categories of employees:</p> <ul style="list-style-type: none"> a) Employees in high risk positions, b) Middle management, c) Board members.
Score
0
Comments
<p>There is no clear evidence that the company provides anti-bribery and corruption training for its employees based on an assessment of their role and exposure to corruption risk.</p>
Evidence
<p>No evidence found.</p>

Question
3.3. Does the company measure and review the effectiveness of its anti-bribery and corruption communications and training programme?
Score
0
Comments
There is no evidence that the company measures or reviews the efficacy of its anti-bribery and corruption communications or training programme.
Evidence
No evidence found.

Question
3.4. Does the company ensure that its employee incentive schemes are designed in such a way that they promote ethical behaviour and discourage corrupt practices?
Score
0
Comments
There is no evidence that the company's incentive schemes incorporate ethical or anti-bribery and corruption principles.
Evidence
No evidence found.

Question
3.5. Does the company commit to and assure itself that it will support and protect employees who refuse to act unethically, even when it might result in a loss of business?
Score
0
Comments
There is no clear evidence that the company commits to support or protect employees who refuse to act unethically, even when it might result in a loss of business.
Evidence
<p>[10] FAQ EthicsPoint (Document) Accessed 03/04/2020 https://secure.ethicspoint.com/domain/media/en/gui/49698/faq.pdf [p.2] Does management really want me to report?</p> <p>We certainly do. In fact, we need you to report. You know what is going on in our company - both good and bad. You may have initial knowledge of an activity that may be cause for concern. Your reporting can minimize the potential negative impact on the company and our people. Also, offering positive input may help identify issues that can improve corporate culture and performance.</p> <p>[p.3] I am aware of some individuals involved with unethical conduct, but it doesn't affect me. Why should I bother reporting it?</p> <p>Our company chooses to promote ethical behavior. All unethical conduct, at any level, ultimately hurts the company and all employees, including you. You only have to consider what happened in recent corporate scandals to see the disastrous effects that a seemingly harmless lapse in ethics can have on an otherwise healthy company. So if you know of any incidents of misconduct or ethical violations, consider it your duty to yourself and your coworkers to report it.</p>

Question
3.6. Does the company have a clear policy of non-retaliation against whistleblowers and employees who report bribery and corruption incidents?
Score
1
Comments
<p>There is evidence the company promotes a policy of non-retaliation against both whistleblowers and employees who report bribery and corruption incidents, which applies company-wide. There is some evidence that the company extends this commitment to third parties including suppliers.</p> <p>However, there is no evidence that the company assures itself of its employees' confidence in this commitment through surveys, usage data, or other clearly stated means.</p>
Evidence
<p>[1] The Standard (Document) Accessed on 14/08/2019 https://perspecta.com/sites/default/files/2019-07/perspecta_CoC_layout_Digital_040219.pdf</p> <p>[p.7] Ethics issues and concerns can be reported in a variety of ways, including anonymously through our ethics helpline. All concerns raised will be treated confidentially and we will never retaliate against any employee who speaks up honestly and in good faith. We expect our employees to behave with integrity, and will hold them accountable if we find misconduct.</p> <p>[p.9] All concerns raised will be treated confidentially and we will never retaliate against any employee who speaks up honestly and in good faith.</p> <p>[...]</p> <p>Our code of conduct provides the ethical guidelines and expectations for conducting business on behalf of Perspecta. All employees and members of the Perspecta Board of Directors, as well as consultants or others representing Perspecta, are expected to act in ways consistent with The Standard.</p> <p>[...]</p> <p>Part of being a leader at Perspecta means promoting an inclusive, positive, ethical work environment where all employees are valued for their contributions. Leaders of Perspecta are responsible to encourage employees to speak up and raise issues or concerns. Modeling ethical behavior or "walking the walk" is crucial to maintain the ethical culture we value as an organization.</p> <p>We do not retaliate and do not tolerate retaliation from others.</p> <p>[p.10] Disciplinary action will be taken against any employee, supervisor or manager who retaliates against an employee who reports a mischarging violation, or who may be responsible for a violation due to inadequate supervision.</p> <p>[8] Perspecta Ethics Channel (Webpage) Accessed 03/04/2020 https://secure.ethicspoint.com/domain/media/en/gui/49698/index.html</p> <p>Perspecta expressly forbids retaliation, direct or indirect, against any employee who in good faith reports misconduct or participates in a company investigation of misconduct.</p> <p>[4] Contingent Worker Code of Conduct (Document) Accessed on 14/08/2019 https://perspecta.com/sites/default/files/2018-11/CW%20code%20of%20conduct.pdf</p> <p>[p.6] Contingent workers should make reports to their employer, and a member of Perspecta management or Perspecta's Ethics and Compliance Office. Perspecta does not tolerate retaliation against anyone who raises a concern honestly and in good faith. Perspecta's Ethics and Compliance Office can be reached as follows:</p>

Call: Contact the Perspecta ethics helpline at 1.855.ETHICS0 or 1.855.384.4270. This helpline, maintained by EthicsPoint, is available 24 hours a day, 365 days a year.

Website: File a report online at www.perspecta.ethicspoint.com.

Mail: Perspecta Inc. Attention: Ethics and Compliance Office 15052 Conference Center Drive Chantilly, VA 20151

Fax: 1.571.313.6936 E-mail: ethics@perspecta.com

[6] Supply Chain and Procurement Terms and Conditions (Document)

Accessed 02/04/2020

[https://perspecta.com/sites/default/files/2020-](https://perspecta.com/sites/default/files/2020-01/PERSPECTA%20ENTERPRISE%20SOLUTIONS%20General%20TC%20Rev.%205%2012202019%20v2.pdf)

[01/PERSPECTA%20ENTERPRISE%20SOLUTIONS%20General%20TC%20Rev.%205%2012202019%20v2.pdf](https://perspecta.com/sites/default/files/2020-01/PERSPECTA%20ENTERPRISE%20SOLUTIONS%20General%20TC%20Rev.%205%2012202019%20v2.pdf)

[p.10] 11.11. Contingent Worker Code of Conduct. Supplier will comply with Perspecta's Contingent Worker Code of Conduct.

Question
3.7. Does the company provide multiple whistleblowing and advice channels for use by all (e.g. employees and external parties), and do they allow for confidential and, wherever possible, anonymous reporting?
Score
2
Comments
<p>There is evidence that the company has multiple channels to report instances of suspected corrupt activity and seek advice on the company's ethics programme. Channels are sufficiently varied to allow employees to raise concerns across the management chain and to a relevant external body. These channels allow for confidential and anonymous reporting. There is evidence indicating the channels are available to all employees in any country of operation and in all relevant languages. There is also evidence indicating that the company's whistleblowing line is open to third parties including suppliers.</p>
Evidence
<p>[1] The Standard (Document) Accessed on 14/08/2019 https://perspecta.com/sites/default/files/2019-07/perspecta_CoC_layout_Digital_040219.pdf [p.9] "See something, say something"</p> <p>At Perspecta, we all have the responsibility to promptly report if we believe that a violation of the code of conduct has occurred or if we are asked to violate the code.</p> <p>You are encouraged to raise issues to your manager. If you are uncomfortable with the answer, seek guidance from:</p> <ul style="list-style-type: none"> • Another manager • ECO or the office of general counsel • Human resources • Security • A phone call to the ethics helpline or email to ethics@perspecta.com <p>Speaking up to report questionable conduct protects the ethical work culture we value as employees and it protects our company. It is never acceptable to violate the code of conduct for an employee's personal benefit or for the benefit of the company.</p> <p>Concerns may be raised anonymously through the ethics helpline or EthicsPoint website.</p> <p>[p.18] About the Perspecta ethics and compliance office At Perspecta, we want to uphold the highest standards of integrity, and we want to do more than comply with laws and regulations.</p> <p>Perspecta's ECO affirms and emphasizes our commitment to ethical conduct. Perspecta's chief of ethics and compliance reports directly to the general counsel, periodically provides reports to the Perspecta Board of Directors and oversees a vigorous companywide program to promote a positive, inclusive and ethical work environment for all employees. The ECO maintains the confidential Perspecta ethics helpline and is also responsible for conducting investigations into alleged violations of The Standard or other Perspecta policies.</p> <p>You are encouraged to reach out to the ECO team whenever you have a question or concern that cannot be readily addressed within your work group or through your manager.</p> <p>If your concern relates to the actions or decisions of the Perspecta ECO, please contact the Perspecta general counsel.</p> <p>How to contact the Perspecta ethics and compliance office Call: Contact the Perspecta ethics helpline at 1.855.ETHICS0 or 1.855.384.4270. This helpline, maintained by EthicsPoint, is available 24 hours a day, 365 days a year. Website:</p>

File a report online at www.perspecta.ethicspoint.com.

Mail:

Perspecta Inc. Attention: Ethics and Compliance Office 15052 Conference Center Drive Chantilly, VA 20151 Fax: 1.571.313.6936 E-mail: ethics@perspecta.com

Anonymous reports may be made through the ethics helpline or the EthicsPoint website.

[3] Ethics (Webpage)

Accessed 03/04/2020

<https://perspecta.com/about-us/ethics-and-social-responsibility>

Reporting an ethical issue

Employees can seek guidance or report a concern by contacting the Perspecta ethics helpline at 1.855.ETHICS0 or 1.855.384.4270, by emailing ethics@perspecta.com, or filing a report online at perspecta.ethicspoint.com.

Anonymous reports may be made through the ethics helpline or the EthicsPoint website.

[8] Perspecta Ethics Channel (Webpage)

Accessed 03/04/2020

<https://secure.ethicspoint.com/domain/media/en/gui/49698/index.html>

Perspecta is an organization with strong values of responsibility and integrity. Our [Code of Conduct](#), The Standard, contains general guidelines for conducting business with the highest ethical standards.

Perspecta is committed to an environment where open, honest communications are the expectation, not the exception. We want you to feel comfortable in approaching your supervisor or management in instances where you believe violations of policies or standards have occurred.

In situations where you prefer to place an anonymous report in confidence, you are encouraged to use this helpline, hosted by a third party helpline provider, EthicsPoint. You are encouraged to submit reports relating to violations stated in our [Code of Conduct](#), as well as asking for guidance related to policies and procedure and providing positive suggestions and stories.

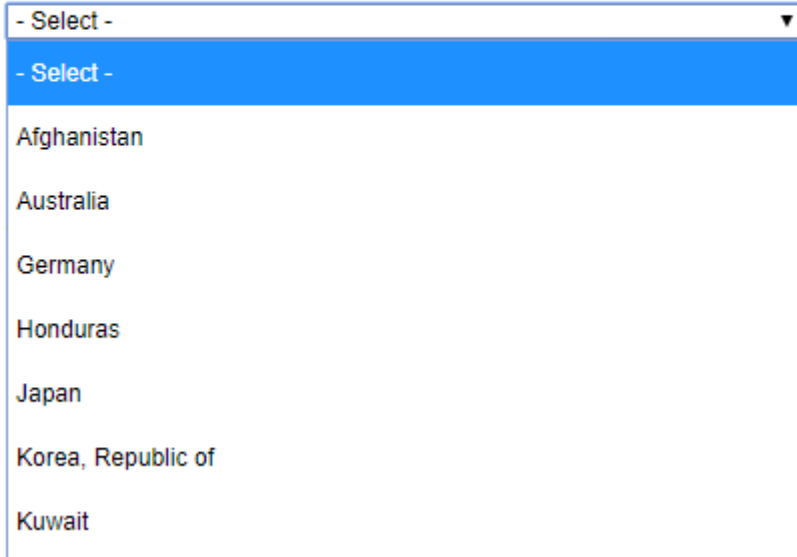
The information you provide will be sent to us by EthicsPoint on a totally confidential and anonymous basis if you should choose. And in our efforts to resolve reported issues, Perspecta controls access to reported information, allowing its distribution to only those who need it to properly investigate.

Perspecta is committed to conducting a fair and thorough review of all actionable concerns, to maintaining employee confidence and confidentiality to the extent the law permits, and to protecting employee personal data, as appropriate. You have our guarantee that your comments will be heard.

Perspecta expressly forbids retaliation, direct or indirect, against any employee who in good faith reports misconduct or participates in a company investigation of misconduct.

To make a report

Select the country in which you are located.



[10] FAQ EthicsPoint (Document)

Accessed 03/04/2020

<https://secure.ethicspoint.com/domain/media/en/gui/49698/faq.pdf>

[p.2] May I report using either the Internet or the telephone?

Yes. With EthicsPoint, you have the ability to file a confidential, anonymous report via either the telephone or the Internet.

What type of situations should I report?

The EthicsPoint system is designed for employees to report any violations of our stated Perspecta Code of Conduct, The Standard, or other concerns you may have.

If I see a violation, shouldn't I just report it to my manager, security, or Human Resources and let them deal with it? When you observe some behavior that you believe violates our code of conduct, we expect you to report it. Ideally, you should bring any concerns forward to your direct manager, or other member of our management team. We recognize, however, that there may be circumstances when you are not comfortable reporting the issue in this manner. It is for such circumstances that we have partnered with EthicsPoint. We would rather you report anonymously than keep the information to yourself.

[p.4] Can I file a report from home and still remain anonymous?

A report from home, a neighbor's computer, or any Internet portal will remain secure and anonymous. An Internet portal never identifies a visitor by screen name and the EthicsPoint system strips away Internet addresses so that anonymity is totally maintained. Plus, EthicsPoint is contractually committed not to pursue a reporter's identity.

I am concerned that the information I provide EthicsPoint will ultimately reveal my identity. How can you assure me that will not happen?

The EthicsPoint system is designed to protect your anonymity. However, if you wish to remain anonymous, you - as a reporting party - need to ensure that the body of the report does not reveal your identity by accident. For example, "From my cube next to Jan Smith..." or "In my 33 years..."

Is the telephone toll-free hot line confidential and anonymous too?

Yes. You will be asked to provide the same information that you would provide in an Internet-based report and an interviewer will type your responses into the EthicsPoint Web site. These reports have the same security and confidentiality measures applied to them during delivery.

What if I want to be identified with my report?

There is a section in the report for identifying yourself, if you wish.

[4] Contingent Worker Code of Conduct (Document)

Accessed on 14/08/2019

<https://perspecta.com/sites/default/files/2018-11/CW%20code%20of%20conduct.pdf>

[p.6] Contingent workers should make reports to their employer, and a member of Perspecta management or Perspecta's Ethics and Compliance Office. Perspecta does not tolerate retaliation against anyone who raises a concern honestly and in good faith. Perspecta's Ethics and Compliance Office can be reached as follows:

Call: Contact the Perspecta ethics helpline at 1.855.ETHICS0 or 1.855.384.4270. This helpline, maintained by EthicsPoint, is available 24 hours a day, 365 days a year.

Website: File a report online at www.perspecta.ethicspoint.com.

Mail: Perspecta Inc. Attention: Ethics and Compliance Office 15052 Conference Center Drive Chantilly, VA 20151

Fax: 1.571.313.6936 E-mail: ethics@perspecta.com

[6] Supply Chain and Procurement Terms and Conditions (Document)

Accessed 02/04/2020

[https://perspecta.com/sites/default/files/2020-](https://perspecta.com/sites/default/files/2020-01/PERSPECTA%20ENTERPRISE%20SOLUTIONS%20General%20TC%20Rev.%205%2012202019%20v2.pdf)

[01/PERSPECTA%20ENTERPRISE%20SOLUTIONS%20General%20TC%20Rev.%205%2012202019%20v2.pdf](https://perspecta.com/sites/default/files/2020-01/PERSPECTA%20ENTERPRISE%20SOLUTIONS%20General%20TC%20Rev.%205%2012202019%20v2.pdf)

[p.10] 11.11. Contingent Worker Code of Conduct. Supplier will comply with Perspecta's Contingent Worker Code of Conduct.

4. Conflict of Interest

Question
4.1. Does the company have a policy defining conflicts of interest – actual, potential and perceived – that applies to all employees and board members?
Score
2
Comments
<p>There is evidence the company has a policy that defines conflicts of interest, including actual, potential and perceived conflicts. The policy explicitly covers all of the categories of possible conflicts listed in the guidance, namely employee and government relationships, financial interests and other employment. The company states that this policy applies to all employees and board members, and those conducting work on its behalf.</p>
Evidence
<p>[1] The Standard (Document) Accessed on 14/08/2019 https://perspecta.com/sites/default/files/2019-07/perspecta_CoC_layout_Digital_040219.pdf [p.9] Our code of conduct provides the ethical guidelines and expectations for conducting business on behalf of Perspecta. All employees and members of the Perspecta Board of Directors, as well as consultants or others representing Perspecta, are expected to act in ways consistent with The Standard.</p> <p>[p.10] Our CEO and senior financial officers have a special duty to ensure that our financial statements and public filings accurately represent our financial position. We must:</p> <p>[...]</p> <ul style="list-style-type: none"> • Promptly disclose any potential conflict of interest <p>[p.11] If you campaign for or hold public office, or serve on commissions or advisory groups, you must be aware of and avoid conflicts of interest that may arise related to your employment with Perspecta. If you plan to seek or accept a public office, you must consult with legal in advance to resolve any potential conflicts of interest.</p> <p>[p.14] We avoid personal conflicts of interest</p> <p>A personal conflict of interest exists when you have divided loyalties – when you have a direct or indirect personal interest in a transaction or matter such that it might reasonably appear to affect the judgment that you exercise on behalf of Perspecta, influence your actions or lead you to neglect Perspecta’s business interests.</p> <p>As Perspecta employees, we have the responsibility to act in a fair and impartial manner in all business dealings, and to place the interests of Perspecta over personal interests in matters relating to Perspecta’s business. Government contracting employees “who perform an acquisition function closely associated with inherently governmental functions or have access to nonpublic information” need to be particularly free from any personal conflict of interest.</p> <p>Personal conflict of interest guidelines</p> <p>You must avoid financial, business or other transactions or situations in which your personal interests might conflict with, or appear to conflict with, the interests of Perspecta. Such situations may arise from relationships with customers, competitors, suppliers, present or prospective employees or from the acquisition or use of company assets for personal gain. An actual personal conflict of interest does not need to be present to constitute a violation of The Standard; you must also avoid activities that create the appearance of a conflict of interest.</p> <p>A personal conflict of interest may exist when you use your contacts or position in the company to advance interests other than the company’s, such as your own private business or financial affairs, or those of a friend or relative (whether or not at the expense of the company). You should never use company property or information for personal gain, or take for yourself personally any opportunity that is discovered through your position at Perspecta.</p>

Examples of how a personal conflict of interest could occur:

- Acceptance of gifts, payment or services from those seeking to do business with Perspecta
- Having a personal interest or potential for gain in any company transaction
- Placement of business with a firm owned or controlled by an employee of Perspecta or their family
- Ownership of, or substantial interest in, a company that is a customer, competitor or a supplier
- Employment by a competitor or potential competitor, regardless of the nature of the employment, while employed by Perspecta
- Acting independently as a consultant to a Perspecta customer or supplier, while employed by Perspecta
- Having a close, personal relationship with a subordinate employee

[p.15] We avoid organizational conflicts of interest

To ensure that Perspecta is free from or properly mitigates organizational conflict of interest (OCI) issues, all new business opportunities are screened by business development and contracts personnel. If during the screening process a potential OCI is identified, Perspecta leadership and contracts will meet to determine what course of action will be pursued.

Proactive screening and resolution of OCI issues ensures our continued participation in new business opportunities, while supporting our policy to conduct business in accordance with the highest standards of ethics and integrity. We avoid conflicts of interest when hiring and working with former government employees

We avoid conflicts of interest when hiring and working with former government employees

Perspecta is proud that many of its employees are former government employees or members of the armed forces, and values the expertise and skill these individuals bring to Perspecta. In recruiting current and former government employees, Perspecta is cognizant that certain laws and regulations may restrict the activities these individuals can perform after leaving government services.

Current and former government employees must undergo screening to identify any post-employment restrictions which might impede an applicant's ability to perform work for the company. In addition, current government employees applying for a position with Perspecta must affirm that they are in compliance with their ethical obligations in seeking outside employment.

You are responsible for ensuring Perspecta avoids conflicts of interest in connection with employing or acquiring the services of current or former government employees. The laws and regulations governing the hiring and employment of former government employees can be difficult to follow. When in doubt, you should consult Perspecta policies and procedures, and seek the advice of your manager, human resources, the ECO or legal.

Question
4.2. Are there procedures in place to identify, declare and manage conflicts of interest, which are overseen by a body or individual ultimately accountable for the appropriate management and handling of conflict of interest cases?
Score
1
Comments
<p>There is some evidence the company has procedures to identify, declare and manage conflicts of interest, including actual, potential and perceived conflicts. The company states that employees should consult their manager, the Human Resources Department, the Ethics and Compliance Officer or Legal Department if they are uncertain about the company's policies and procedures. Disciplinary measures apply to individuals which breach the company's code of conduct.</p> <p>However, there is no reference to a specific body or individual with oversight and accountability for handling cases, nor is there evidence that all employee and board member declarations are held in a dedicated register or central depository that is accessible to those responsible for oversight of the process. The policy also does not mention examples of criteria for recusals.</p>
Evidence
<p>[1] The Standard (Document) Accessed on 14/08/2019 https://perspecta.com/sites/default/files/2019-07/perspecta_CoC_layout_Digital_040219.pdf [p.9] Our code of conduct provides the ethical guidelines and expectations for conducting business on behalf of Perspecta. All employees and members of the Perspecta Board of Directors, as well as consultants or others representing Perspecta, are expected to act in ways consistent with The Standard.</p> <p>[...]</p> <p>Violations of The Standard or other Perspecta policies may result in disciplinary action, up to and including termination of employment.</p> <p>[p.10] Our CEO and senior financial officers have a special duty to ensure that our financial statements and public filings accurately represent our financial position. We must:</p> <p>[...]</p> <ul style="list-style-type: none"> • Promptly disclose any potential conflict of interest • Honor, safeguard and promote compliance with our internal control systems • Ensure our books and records are maintained in accordance with applicable accounting policies, laws, rules and regulations • Respect and promote the need to report suspected accounting, internal control or audit violations to appropriate government agencies, such as the U.S. Securities and Exchange Commission. <p>[p.11] If you campaign for or hold public office, or serve on commissions or advisory groups, you must be aware of and avoid conflicts of interest that may arise related to your employment with Perspecta. If you plan to seek or accept a public office, you must consult with legal in advance to resolve any potential conflicts of interest.</p> <p>[p.14] We avoid personal conflicts of interest</p> <p>A personal conflict of interest exists when you have divided loyalties – when you have a direct or indirect personal interest in a transaction or matter such that it might reasonably appear to affect the judgment that you exercise on behalf of Perspecta, influence your actions or lead you to neglect Perspecta's business interests.</p> <p>As Perspecta employees, we have the responsibility to act in a fair and impartial manner in all business dealings, and to place the interests of Perspecta over personal interests in matters relating to Perspecta's business.</p>

Government contracting employees “who perform an acquisition function closely associated with inherently governmental functions or have access to nonpublic information” need to be particularly free from any personal conflict of interest.

Personal conflict of interest guidelines

You must avoid financial, business or other transactions or situations in which your personal interests might conflict with, or appear to conflict with, the interests of Perspecta. Such situations may arise from relationships with customers, competitors, suppliers, present or prospective employees or from the acquisition or use of company assets for personal gain. An actual personal conflict of interest does not need to be present to constitute a violation of The Standard; you must also avoid activities that create the appearance of a conflict of interest.

A personal conflict of interest may exist when you use your contacts or position in the company to advance interests other than the company's, such as your own private business or financial affairs, or those of a friend or relative (whether or not at the expense of the company). You should never use company property or information for personal gain, or take for yourself personally any opportunity that is discovered through your position at Perspecta. Examples of how a personal conflict of interest could occur:

- Acceptance of gifts, payment or services from those seeking to do business with Perspecta
- Having a personal interest or potential for gain in any company transaction
- Placement of business with a firm owned or controlled by an employee of Perspecta or their family
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- Employment by a competitor or potential competitor, regardless of the nature of the employment, while employed by Perspecta
- Acting independently as a consultant to a Perspecta customer or supplier, while employed by Perspecta
- Having a close, personal relationship with a subordinate employee

[p.15] We avoid organizational conflicts of interest

To ensure that Perspecta is free from or properly mitigates organizational conflict of interest (OCI) issues, all new business opportunities are screened by business development and contracts personnel. If during the screening process a potential OCI is identified, Perspecta leadership and contracts will meet to determine what course of action will be pursued.

Proactive screening and resolution of OCI issues ensures our continued participation in new business opportunities, while supporting our policy to conduct business in accordance with the highest standards of ethics and integrity.

We avoid conflicts of interest when hiring and working with former government employees

Perspecta is proud that many of its employees are former government employees or members of the armed forces, and values the expertise and skill these individuals bring to Perspecta. In recruiting current and former government employees, Perspecta is cognizant that certain laws and regulations may restrict the activities these individuals can perform after leaving government services.

Current and former government employees must undergo screening to identify any post-employment restrictions which might impede an applicant's ability to perform work for the company. In addition, current government employees applying for a position with Perspecta must affirm that they are in compliance with their ethical obligations in seeking outside employment.

You are responsible for ensuring Perspecta avoids conflicts of interest in connection with employing or acquiring the services of current or former government employees. The laws and regulations governing the hiring and employment of former government employees can be difficult to follow. When in doubt, you should consult Perspecta policies and procedures, and seek the advice of your manager, human resources, the ECO or legal.

Question
4.3. Does the company have a policy and procedure regulating the appointment of directors, employees or consultants from the public sector?
Score
1
Comments
<p>There is evidence that the company has a policy that addresses the risks associated with the employment of public officials. The company states that it conducts screening of current and former government employees.</p> <p>However, there is no evidence that the company has a policy to implement a cooling-off period of at least 12 months before such public officials are permitted to have any form of contact or relationship with their former organisation on the company's behalf. There is also no evidence the company requires senior compliance officer (or equivalent) approval for the initiation of any employment discussions nor that it conducts a review of actual, potential or perceived conflicts of interest.</p>
Evidence
<p>[1] The Standard (Document) Accessed on 14/08/2019 https://perspecta.com/sites/default/files/2019-07/perspecta_CoC_layout_Digital_040219.pdf [p.15] We avoid conflicts of interest when hiring and working with former government employees</p> <p>Perspecta is proud that many of its employees are former government employees or members of the armed forces, and values the expertise and skill these individuals bring to Perspecta. In recruiting current and former government employees, Perspecta is cognizant that certain laws and regulations may restrict the activities these individuals can perform after leaving government services.</p> <p>Current and former government employees must undergo screening to identify any post-employment restrictions which might impede an applicant's ability to perform work for the company. In addition, current government employees applying for a position with Perspecta must affirm that they are in compliance with their ethical obligations in seeking outside employment.</p> <p>You are responsible for ensuring Perspecta avoids conflicts of interest in connection with employing or acquiring the services of current or former government employees. The laws and regulations governing the hiring and employment of former government employees can be difficult to follow. When in doubt, you should consult Perspecta policies and procedures, and seek the advice of your manager, human resources, the ECO or legal.</p>

Question
4.4. Does the company report details of the contracted services of serving politicians to the company?
Score
0
Comments
There is no evidence that the company reports details of the contracted services of serving politicians.
Evidence
No evidence found.

5. Customer Engagement

5.1 Contributions, Donations and Sponsorships

Question
5.1.1. Does the company have a clearly defined policy and/or procedure covering political contributions?
Score
0
Comments
There is evidence that the company generally prohibits political contributions, but these are permissible in certain circumstances. The company also operates a Political Action Committee.
Evidence
<p>[1] The Standard (Document) Accessed on 14/08/2019 https://perspecta.com/sites/default/files/2019-07/perspecta_CoC_layout_Digital_040219.pdf [p.11] We comply with laws and regulations governing political contributions and lobbying</p> <p>Many countries, including the United States, prohibit Perspecta from donating corporate funds, goods or services—including employee work time—directly or indirectly, to political candidates. Local and state laws also govern Perspecta's political contributions and activities. Because the laws in this area are complex, you must obtain written approval of legal before using any company funds, assets or facilities for the benefit of political parties or candidates anywhere in the world.</p> <p>You are encouraged to participate personally in civic affairs and the political process and to support the political parties and candidates of your choice. Your involvement and participation in the political process must be on an individual basis, on your own time, at your own expense and not as a representative of Perspecta. If you are directly solicited to contribute to a political campaign or attend an event on behalf of Perspecta, you must contact legal prior to the event.</p> <p>If you campaign for or hold public office, or serve on commissions or advisory groups, you must be aware of and avoid conflicts of interest that may arise related to your employment with Perspecta. If you plan to seek or accept a public office, you must consult with legal in advance to resolve any potential conflicts of interest.</p> <p>You must also be certain to know and follow company guidance before contacting U.S. congressional and executive branch employees and staff. If you engage in such activity, you may be engaged in lobbying. You must coordinate with legislative affairs before interacting with U.S. congressional and executive branch employees and staff.</p> <p>Perspecta has established a Political Action Committee in which you may elect to participate, but your participation is entirely voluntary.</p>

Question
5.1.2. Does the company publish details of all political contributions made by the company and its subsidiaries, or a statement that it has made no such contribution?
Score
0
Comments
The company does not disclose on its website any details of political contributions made by the company or its PAC.
Evidence
No evidence found.

Question
5.1.3. Does the company have a clearly defined policy and/or procedure covering charitable donations and sponsorships, whether made directly or indirectly, and does it publish details of all such donations made by the company and its subsidiaries?
Score
0
Comments
Although the company publishes some information regarding its charitable contributions, there is no evidence that the company has a policy and/or procedure covering both charitable donations and sponsorships. There is also no evidence that the company has measures to ensure donations are not used as vehicles for bribery and corruption, for example, by specifying criteria for donations, procedures for senior sign-off, or due diligence on recipients.
Evidence
<p>[9] Annual Report 2019 (Document) Accessed 03/04/2020 https://investors.perspecta.com/Cache/IRCache/984cd1e6-0d0f-34a4-b991-2987db497c13.PDF?O=PDF&T=&Y=&D=&FID=984cd1e6-0d0f-34a4-b991-2987db497c13&iid=10418483</p> <p>[p.13] Perspecta employees have a strong social conscience and we are second to none in our generosity and commitment to our communities. Among the many integration activities, we achieved incredible charitable results in our short time together:</p> <ul style="list-style-type: none"> • Raised more than \$310,000 for the American Heart Association • Provided 950 volunteers and supported 122 veteran facilities on Veterans Day • Donated more than \$75,000 to the American Red Cross for hurricane relief efforts <p>Whether by serving our communities, collaborating with our customers and colleagues or demonstrating respect to each other, we prove our uniqueness in this dynamic and rapidly evolving government contracting market every single day.</p>

5.2 Lobbying

Question
5.2.1 Does the company have a policy and/or procedure covering responsible lobbying?
Score
1
Comments
<p>Based on public information, there is some evidence that the company has a policy on lobbying. Employees must coordinate with the Legislative Affairs Department before engaging in activity which might constitute lobbying.</p> <p>However, the company does not define lobbying or responsible lobbying in publicly available evidence. There is no mention of certain standards of conduct or specific oversight mechanisms that apply to all types of lobbyists. It is also unclear based on publicly available evidence whether the policy applies to third parties and other entities controlled by the company.</p>
Evidence
<p>[1] The Standard (Document) Accessed on 14/08/2019 https://perspecta.com/sites/default/files/2019-07/perspecta_CoC_layout_Digital_040219.pdf [p.11] We comply with laws and regulations governing political contributions and lobbying</p> <p>Many countries, including the United States, prohibit Perspecta from donating corporate funds, goods or services—including employee work time—directly or indirectly, to political candidates. Local and state laws also govern Perspecta's political contributions and activities. Because the laws in this area are complex, you must obtain written approval of legal before using any company funds, assets or facilities for the benefit of political parties or candidates anywhere in the world.</p> <p>You are encouraged to participate personally in civic affairs and the political process and to support the political parties and candidates of your choice. Your involvement and participation in the political process must be on an individual basis, on your own time, at your own expense and not as a representative of Perspecta. If you are directly solicited to contribute to a political campaign or attend an event on behalf of Perspecta, you must contact legal prior to the event.</p> <p>If you campaign for or hold public office, or serve on commissions or advisory groups, you must be aware of and avoid conflicts of interest that may arise related to your employment with Perspecta. If you plan to seek or accept a public office, you must consult with legal in advance to resolve any potential conflicts of interest.</p> <p>You must also be certain to know and follow company guidance before contacting U.S. congressional and executive branch employees and staff. If you engage in such activity, you may be engaged in lobbying. You must coordinate with legislative affairs before interacting with U.S. congressional and executive branch employees and staff.</p> <p>Perspecta has established a Political Action Committee in which you may elect to participate, but your participation is entirely voluntary.</p>

Question
5.2.2 Does the company publish details of the aims and topics of its public policy development and lobbying activities it carries out?
Score
0
Comments
The company does not publish any information on its lobbying aims, topics or activities on its website.
Evidence
No evidence found.

Question
5.2.3 Does the company publish full details of its global lobbying expenditure?
Score
0
Comments
The company does not publish any information on its global lobbying expenditure on its website.
Evidence
No evidence found.

5.3 Gifts and Hospitality

Question
5.3.1 Does the company have a policy and/or procedure on gifts and hospitality to ensure they are bona fide to prevent undue influence or other corruption?
Score
1
Comments
<p>There is evidence that the company has a policy on the giving and receipt of gifts and hospitality with procedures designed to ensure that such promotional expenses are bona fide and not used for bribery. This policy establishes financial limits, along with an approval procedure for different types of expenses. The policy also explicitly addresses the risks associated with gifts and hospitality given to or received from domestic and foreign public officials.</p> <p>However, there is no evidence that all gifts and hospitality above a certain threshold are recorded in a dedicated register or central depository that is accessible to those responsible for oversight of the process.</p>
Evidence
<p>[1] The Standard (Document) Accessed on 14/08/2019 https://perspecta.com/sites/default/files/2019-07/perspecta_CoC_layout_Digital_040219.pdf [p.13] We provide and accept appropriate amenities</p> <p>Perspecta defines the term business amenity broadly to mean a gift, gratuity, favor, benefit, loan, commission, discount, forbearance or other intangible or tangible item having monetary value for which fair market value is not paid by the recipient. Such courtesies include, but are not limited to cash, honoraria, entertainment and recreation (tickets to sporting, recreational or other events, passes, fees, etc.), services, training, transportation, discounts, promotional items, lodging, meals, drinks, door prizes or use of a donor's time, material, equipment or facilities. Perspecta does not consider the following items to be "amenities":</p> <ul style="list-style-type: none"> • Modest refreshments, such as water, tea, coffee, and snacks (other than meals) • Greeting cards, plaques, certificates, etc. intended for presentation • Benefits (e.g. discounts) that are also available to the public or to all government employees • Anything for which the recipient pays fair market value <p>We do not offer or provide business amenities to government customers</p> <p>The rules and regulations that apply to the offering of business courtesies to government employees, officials and representatives of the U.S. federal, state and local or foreign governments are complex. In this marketplace, even the appearance of impropriety can be the basis for protests, governmental inquiries, or the loss of Perspecta's ability to conduct government business. It is the Perspecta policy that Perspecta employees may not offer, give or promise to give, directly or indirectly, any government employee anything of value – including gifts, meals, entertainment or travel – unless the recipient pays its fair market value. Other government contractors often have similar restrictions concerning the acceptance of business amenities by their personnel which should be respected in our dealings with them.</p> <p>Limited exceptions may apply only when approved, in advance, by the ECO and your manager. Only very limited exceptions will be considered for approval, such as openly announced marketing activities, appropriate no-charge service offerings, select promotional activities and public policy initiatives.</p> <p>In all cases, even if one of the limited exceptions applies, Perspecta employees may not offer, give, solicit or receive any amenity or other thing of value in exchange for favorable treatment or advantage, or for the purpose of obtaining, or attempting to influence the award of a contract or subcontract.</p> <p>Personal gifts to friends and family</p> <p>Personal gifts to friends or family who happen to work for a government entity are not prohibited as long as:</p>

- The gift is given under circumstances which make it clear that the gift is motivated by a family or personal relationship and that the relationship is not rooted in business activities with Perspecta
- Perspecta funding is not, in any way, used to pay for a personal gift provided within these guidelines

Offering or providing business amenities to nongovernment customers and partners

You may provide business amenities of reasonable value to nongovernment customers in support of Perspecta business activities, provided:

- The practice is not for any improper purpose and does not violate any law or regulation or, to your knowledge after reasonable inquiry, the standards of conduct of the recipient's organization
 - The business amenity is consistent with marketplace practices, infrequent in nature and not lavish or extravagant
- You are prohibited from offering or giving tangible gifts (including tickets to sporting, recreational or other events) having a market value of \$100.00 or more to a person or entity with which Perspecta does or seeks to do business, unless specifically approved, in advance, by the ECO and your manager.

[p.14] Acceptance of business amenities by Perspecta employees in nonprocurement functions

Although you may not use your position at Perspecta to obtain business amenities, it is permissible to accept unsolicited business courtesies, provided the acceptance:

- Will promote goodwill and successful business relations
- Is not lavish or extravagant under the circumstances
- Is not frequent and does not reflect a pattern or the appearance of a pattern of frequent acceptance of amenities from the same entities or persons
- Has a market value of \$100.00 or less
- Is something you would feel comfortable discussing with your manager or a coworker, or having known by the public

Solicitation of business amenities is always prohibited. It is your personal responsibility to ensure that your acceptance of a business amenity does not create the perception that favors were granted to secure favorable treatment.

6. Supply Chain Management

Question
6.1. Does the company require the involvement of its procurement department in the establishment of new supplier relationships and in the oversight of its supplier base?
Score
0
Comments
There is no publicly available evidence that the company requires the involvement of its procurement department in the establishment and oversight of its supplier base.
Evidence
No evidence found.

Question
6.2 Does the company conduct risk-based anti-bribery and corruption due diligence when engaging or re-engaging with its suppliers?
Score
0
Comments
There is some evidence to suggest that the company conducts due diligence on its supply chain, however, the company does not provide sufficient detail to receive a score of '1'.
Evidence
<p>[11] Assessment Begin Checklist Accessed 16/04/2020 https://perspecta.com/sites/default/files/2019-06/ABC-Perspecta.doc</p> <p>[p.1] Supplier</p> <p>Mandatory Conditions of Assignment Verification</p> <p>[...]</p> <p>Background Check Completed</p> <p>[...]</p> <p>Not a citizen of an Embargoed or Sanctioned Country (Cuba, Iran, Myanmar/Burma, North Korea, Sudan, Syria) checked (If they are a citizen of one of these countries, we cannot proceed with engagement.)</p> <p>[...]</p> <p>Restricted Party List (RPL) checked</p>

Question
6.3 Does the company require all of its suppliers to have adequate standards of anti-bribery and corruption policies and procedures in place?
Score
1
Comments
<p>There is evidence that the company requires suppliers to have adequate anti-bribery and corruption policies and procedures in place. Suppliers are required to comply with the company's Contingent Worker Code of Conduct, which prohibits bribery and facilitation payments, and also includes procedures to address conflicts of interest, gifts and hospitality, and whistleblowing.</p> <p>However, there is no clear evidence that the company assures itself of this when onboarding new suppliers and when there is a significant change in the business relationship.</p>
Evidence
<p>[4] Contingent Worker Code of Conduct (Document) Accessed on 14/08/2019 https://perspecta.com/sites/default/files/2018-11/CW%20code%20of%20conduct.pdf [p.2] Anti-corruption</p> <p>Contingent workers must not offer bribes, kickbacks or engage in corrupt practices. Contingent workers must comply with all ethical standards and applicable law in every country in which Perspecta does business.</p> <p>Anti-corruption: Contingent workers must not offer or provide bribes, kickbacks or gifts to win or retain business or to improperly influence a business decision. Contingent workers are prohibited from offering, promising, or providing money or anything of value, either directly or indirectly, by employees or through other parties, to representatives of commercial entities or to government officials for the purpose of obtaining or retaining business or otherwise gaining a business advantage in any country. The U.S. Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act (UKBA) prohibit any payment or gift to government officials, political parties, candidates for public or political office for the purpose of winning or keeping business. The UKBA also prohibits any payment or gift to commercial entities for the purpose of winning or keeping business.</p> <ul style="list-style-type: none"> • The FCPA and the UKBA apply to the actions of all Perspecta employees, Perspecta subsidiaries, joint ventures, contingent workers, agents and representatives. • In short, anti-corruption means no acceptance or payment of: <ul style="list-style-type: none"> o Anything of value provided for the purpose of winning or keeping business o Any form of bribe or kickback <p>Facilitation Payments: Unless subjected to duress, contingent workers may not offer or make facilitation payments to any government official for routine government actions, either directly or indirectly. Duress occurs when a contingent worker fears physical harm or imprisonment if the facilitation payment isn't made and there is no safe alternative to complying with the demand. The duress exception applies only to one-time payment, typically of small value. Repeated facilitation payments or facilitation payments of high value are not permitted. Any payment of a facilitation payment must be reported to Perspecta Legal within 24 hours of the payment.</p> <p>[p.2] Business gifts and entertainment</p> <p>Contingent workers may not provide or receive business amenities (gifts, meals, services, entertainment, or anything else of value) when doing so creates the appearance of impropriety or undue influence. This restriction applies to amenities given to or received from representatives of Perspecta, or its current or potential customers, channel partners, suppliers, other business partners or competitors.</p> <p>[p.3] Conflicts of interest</p> <p>Contingent workers must always make decisions in the best interest of Perspecta and based on the contract with their employer when conducting Perspecta business. Contingent workers may not receive any personal profit or</p>

advantage, other than their compensation from their employer, in connection with any transaction involving Perspecta. Contingent workers must not engage in:

- Any activity that would present a conflict of interest related to their employer and/or Perspecta
- Any activity that could be perceived as a potential conflict of interest related to their employer and/or Perspecta

[p.5] Reporting violations

Contingent workers have an obligation to report any alleged misconduct immediately, including misconduct by employees, clients, contractors, partners and suppliers. Contingent workers should always act honestly and in good faith, and in a respectful manner when raising concerns related to or otherwise using this Contingent Worker Code of Conduct.

[p.6] Contingent workers should make reports to their employer, and a member of Perspecta management or Perspecta's Ethics and Compliance Office. Perspecta does not tolerate retaliation against anyone who raises a concern honestly and in good faith. Perspecta's Ethics and Compliance Office can be reached as follows:

Call: Contact the Perspecta ethics helpline at 1.855.ETHICS0 or 1.855.384.4270. This helpline, maintained by EthicsPoint, is available 24 hours a day, 365 days a year.

Website: File a report online at www.perspecta.ethicspoint.com.

Mail: Perspecta Inc. Attention: Ethics and Compliance Office 15052 Conference Center Drive Chantilly, VA 20151

Fax: 1.571.313.6936 E-mail: ethics@perspecta.com

[6] Supply Chain and Procurement Terms and Conditions (Document)

Accessed 02/04/2020

<https://perspecta.com/sites/default/files/2020-01/PERSPECTA%20ENTERPRISE%20SOLUTIONS%20General%20TC%20Rev.%205%2012202019%20v2.pdf>

[p.9] 11.8. Subcontractors. Supplier will not subcontract any Services and/or Deliverables to other persons or entities without the prior written approval of Perspecta. Supplier agrees to impose on its Subcontractors the same obligations imposed upon Supplier under the Agreement with respect to safety, security, confidentiality, Personal Data, insurance and insurance certificates, indemnification, Perspecta's Accessibility Requirements, Perspecta's Contingent Worker Code of Conduct and Perspecta's Social and Environmental Responsibility Policy. Supplier shall be responsible and liable for all acts of its Personnel. Compensation for subcontracted services will be included in the fees and costs billed by Supplier according to Section 2 (Financial Terms) of the Agreement.

[p.10] 11.11. Contingent Worker Code of Conduct. Supplier will comply with Perspecta's Contingent Worker Code of Conduct.

13. WARRANTIES

13.1. Supplier warrants:

13.1.1. It is properly organized under the laws of the jurisdiction of its place of incorporation, and that it has the authority to enter this Agreement;

13.1.2. it shall abide by all applicable domestic and international laws throughout the course of the Agreement, including but not limited to the US Foreign Corrupt Practices Act and the UK Anti-Bribery Act;

[p.13] 17. GENERAL PROVISIONS

17.1. Anti-Corruption Laws. Perspecta advises Supplier that Perspecta is subject to the US Foreign Corrupt Practices Act ("FCPA"), the UK Bribery Act ("UKBA"), as well as other global anti-corruption laws. These laws prohibit the payment or promise of payment of anything of value by Perspecta or its Affiliates, either directly or indirectly, to the representative of a commercial entity or an official of a foreign government, foreign political party, party official, or candidate for foreign office, for the purpose of influencing any act or decision in their official capacity, or inducing that official to use their influence with a foreign government to assist Perspecta or its Affiliates, in obtaining, retaining, or directing business to any person, or in securing any improper business advantage. Supplier agrees that it will not take any action, which could cause Perspecta to be in violation of the FCPA, UKBA or any other applicable anti-corruption law or regulation. If Supplier becomes aware of any such violation, it will immediately notify Perspecta.

[9] Annual Report 2019 (Document)

Accessed 03/04/2020

<https://investors.perspecta.com/Cache/IRCache/984cd1e6-0d0f-34a4-b991-2987db497c13.PDF?O=PDF&T=&Y=&D=&FID=984cd1e6-0d0f-34a4-b991-2987db497c13&iid=10418483>

[p.22] We are subject to the U.S. Foreign Corrupt Practices Act of 1977, as amended ("FCPA"), and similar anti-bribery laws in other jurisdictions. We pursue opportunities in certain parts of the world that experience government corruption and, in certain circumstances, compliance with anti-bribery laws may conflict with local customs and

practices. Our internal policies mandate compliance with all applicable anti-bribery laws. We require our employees, partners, subcontractors, agents, and others to comply with the FCPA and other anti-bribery laws.

Question
6.4 Does the company ensure that its suppliers require all their sub-contractors to have anti-corruption programmes in place that at a minimum adhere to the standards established by the main contractor?
Score
2
Comments
<p>There is evidence that the company takes steps to ensure that the substance of its anti-bribery and corruption programme and standards are required of sub-contractors throughout the supply chain. It ensures this by requiring that its suppliers obtain its written approval before engaging any subcontractors, and that subcontractors adhere to its Code of Conduct.</p>
Evidence
<p>[6] Supply Chain and Procurement Terms and Conditions (Document) Accessed 02/04/2020 https://perspecta.com/sites/default/files/2020-01/PERSPECTA%20ENTERPRISE%20SOLUTIONS%20General%20TC%20Rev.%205%2012202019%20v2.pdf [p.9] 11.8. Subcontractors.</p> <p>Supplier will not subcontract any Services and/or Deliverables to other persons or entities without the prior written approval of Perspecta. Supplier agrees to impose on its Subcontractors the same obligations imposed upon Supplier under the Agreement with respect to safety, security, confidentiality, Personal Data, insurance and insurance certificates, indemnification, Perspecta's Accessibility Requirements, Perspecta's Contingent Worker Code of Conduct and Perspecta's Social and Environmental Responsibility Policy.</p>

Question
6.5 Does the company publish high-level results from ethical incident investigations and disciplinary actions against suppliers?
Score
0
Comments
There is no evidence that the company publishes any data on ethical or anti-bribery and corruption investigations relating to its suppliers, or the associated disciplinary actions.
Evidence
No evidence found.

7. Agents, Intermediaries and Joint Ventures

7.1 Agents and Intermediaries

Question
7.1.1 Does the company have a clear policy on the use of agents?
Score
1
Comments
<p>There is some evidence that the company has a policy related to the use of agents.</p> <p>However, the company does not provide details of specific controls to mitigate the corruption risks associated with the use of agents. There is also no evidence that the company commits to establishing and verifying that the use of agents is, in each case, necessary to perform a legitimate business function. In addition, it is unclear whether the company's policy also applies to subsidiaries and joint ventures.</p>
Evidence
<p>[1] The Standard (Document) Accessed on 14/08/2019 https://perspecta.com/sites/default/files/2019-07/perspecta_CoC_layout_Digital_040219.pdf [p.15] We properly engage consultants, representatives and other third parties</p> <p>You must not retain a consultant, representative or other third party to conduct business in a manner that is contrary to Perspecta's policies or procedures, or that would circumvent our values and principles. For example, you must not retain consultants, representatives or other third parties for the purpose of paying bribes or kickbacks, engaging in industrial espionage, obtaining the proprietary data of a third party without authority, or improperly gaining inside information or influence.</p> <p>You are responsible for seeking advice from legal prior to engaging an international or domestic consultant. Consultants and representatives must certify their willingness to comply with The Standard, Perspecta's policies and procedures, and all applicable laws and regulations.</p> <p>[9] Annual Report 2019 (Document) Accessed 03/04/2020 https://investors.perspecta.com/Cache/IRCache/984cd1e6-0d0f-34a4-b991-2987db497c13.PDF?O=PDF&T=&Y=&D=&FID=984cd1e6-0d0f-34a4-b991-2987db497c13&iid=10418483 [p.22] We are subject to the U.S. Foreign Corrupt Practices Act of 1977, as amended ("FCPA"), and similar anti-bribery laws in other jurisdictions. We pursue opportunities in certain parts of the world that experience government corruption and, in certain circumstances, compliance with anti-bribery laws may conflict with local customs and practices. Our internal policies mandate compliance with all applicable anti-bribery laws. We require our employees, partners, subcontractors, agents, and others to comply with the FCPA and other anti-bribery laws. Our policies or procedures may not protect us against liability under the FCPA or other laws for actions taken by our employees and intermediaries. If we are found to be liable for FCPA violations (either due to our own acts or our omissions, or due to the acts or omissions of others), we could suffer from severe criminal or civil penalties or other sanctions, which could have a material adverse effect on our reputation, business, results of operations or cash flows. In addition, detecting, investigating, and resolving actual or alleged violations of the FCPA or other anti-bribery violations is expensive and could consume significant time and attention of our senior management.</p>

Question
7.1.2 Does the company conduct risk-based anti-bribery and corruption due diligence when engaging or re-engaging its agents and intermediaries?
Score
0
Comments
There is no publicly available evidence that the company conducts anti-bribery and corruption due diligence on its agents or intermediaries.
Evidence
No evidence found.

Question
7.1.3 Does the company aim to establish the ultimate beneficial ownership of its agents and intermediaries?
Score
0
Comments
There is no publicly available evidence that the company aims to establish the beneficial ownership of its agents.
Evidence
No evidence found.

Question
7.1.4 Does the company's anti-bribery and corruption policy apply to all agents and intermediaries acting for or on behalf of the company, and does it require anti-bribery and corruption clauses in its contracts with these entities?
Score
0
Comments
There is evidence that the company's code of conduct, The Standard, applies to agents and intermediaries. However, there is no publicly available evidence that the company incorporates anti-corruption clauses in contracts with its agents and intermediaries, which include clear audit and termination rights.
Evidence
<p>[1] The Standard (Document) Accessed on 14/08/2019 https://perspecta.com/sites/default/files/2019-07/perspecta_CoC_layout_Digital_040219.pdf</p> <p>[p.9] Our code of conduct provides the ethical guidelines and expectations for conducting business on behalf of Perspecta. All employees and members of the Perspecta Board of Directors, as well as consultants or others representing Perspecta, are expected to act in ways consistent with The Standard.</p> <p>[p.15] We properly engage consultants, representatives and other third parties</p> <p>You must not retain a consultant, representative or other third party to conduct business in a manner that is contrary to Perspecta's policies or procedures, or that would circumvent our values and principles. For example, you must not retain consultants, representatives or other third parties for the purpose of paying bribes or kickbacks, engaging in industrial espionage, obtaining the proprietary data of a third party without authority, or improperly gaining inside information or influence.</p> <p>You are responsible for seeking advice from legal prior to engaging an international or domestic consultant. Consultants and representatives must certify their willingness to comply with The Standard, Perspecta's policies and procedures, and all applicable laws and regulations.</p>

Question
7.1.5 Does the company ensure that its incentive schemes for agents are designed in such a way that they promote ethical behaviour and discourage corrupt practices?
Score
0
Comments
There is no evidence that the company's incentive structures for agents are designed to minimise risks of anti-bribery and corruption.
Evidence
No evidence found.

Question
7.1.6 Does the company publish details of all agents currently contracted to act with and on behalf of the company?
Score
0
Comments
The company does not publish any details of the agents currently contracted to act for or on behalf of the company.
Evidence
No evidence found.

Question
7.1.7 Does the company publish high-level results from incident investigations and sanctions applied against agents?
Score
0
Comments
There is no evidence that the company publishes any data on ethical or bribery and corruption related investigations, incidents or the associated disciplinary actions involving agents.
Evidence
No evidence found.

7.2 Joint Ventures

Question
7.2.1 Does the company conduct risk-based anti-bribery and corruption due diligence when entering into and operating as part of joint ventures?
Score
0
Comments
There is no publicly available evidence that the company conducts anti-bribery and corruption due diligence on its joint venture partners.
Evidence
No evidence found.

Question
7.2.2 Does the company commit to incorporating anti-bribery and corruption policies and procedures in all of its joint venture partnerships, and does it require anti-bribery and corruption clauses in its contracts with joint venture partners?
Score
0
Comments
There is no publicly available evidence that the company commits to establishing or implementing anti-bribery and corruption policies or procedures in its joint ventures. There is also no evidence that the company requires anti-bribery and corruption clauses in its contracts with joint venture partners.
Evidence
No evidence found.

Question
7.2.3 Does the company commit to take an active role in preventing bribery and corruption in all of its joint ventures?
Score
0
Comments
There is no evidence that the company commits to take an active role in preventing bribery and corruption in all of its joint ventures.
Evidence
No evidence found.

8. Offsets

Question
8.1 Does the company explicitly address the corruption risks associated with offset contracting, and is a dedicated body, department or team responsible for oversight of the company's offset activities?
Score
0
Comments
There is no evidence that the company addresses the corruption risks associated with offset contracts, nor that the company has a dedicated body, department or team which is responsible for monitoring of the company's offset activities.
Evidence
No evidence found.

Question
8.2 Does the company conduct risk-based anti-bribery and corruption due diligence on all aspects of its offset obligations, which includes an assessment of the legitimate business rationale for the investment?
Score
0
Comments
There is no evidence that the company has formal procedures in place to conduct risk-based anti-bribery and corruption due diligence on its offset obligations.
Evidence
No evidence found.

Question
8.3 Does the company publish details of all offset agents and brokers currently contracted to act with and/or on behalf of the company?
Score
0
Comments
The company does not publish any details of the offset agents, brokers or consultancy firms currently contracted to act with and on behalf of the company's offset programme.
Evidence
No evidence found.

Question
8.4 Does the company publish details about the beneficiaries of its indirect offset projects?
Score
0
Comments
The company does not publish any details of its offset obligations.
Evidence
No evidence found.

9. High Risk Markets

Question
9.1 Does the company have enhanced risk management procedures in place for the supply of goods or services to markets or customers in countries identified as at a high risk of corruption?
Score
0
Comments
There is no evidence that the company acknowledges the corruption risks of operating in different markets, or that risk assessment procedures are used to inform the company's operations in high risk markets.
Evidence
No evidence found.

Question

9.2 Does the company disclose details of all of its fully consolidated subsidiaries and non-fully consolidated holdings (associates, joint ventures and other related entities)?

Score

1

Comments

The company publishes a list of its subsidiaries on an annual basis. This list includes the country and U.S. state of incorporation for each entity.

However, it is unclear whether the list includes all of the company's holdings. The list also does not include the percentages owned or countries of operation for each entity.

Evidence
[7] Form 10K March 2019 (Document)


Accessed 14/08/2019

<https://investors.perspecta.com/Cache/IRCache/3d6fc145-82a0-24a2-a412-f5d3fba2321b.pdf>

[p.108]

PERSPECTA INC.
Subsidiaries as of March 31, 2019

Entity Name	US Jurisdiction
Perspecta Inc. - Incorporated 10/10/2017	Nevada
Perspecta HC LLC - Formed 8/27/2008	Delaware
NHIC, Corp - Incorporated 6/27/2006	Texas
Perspecta Enterprise Solutions LLC - Formed 3/25/1994	Delaware
SafeGuard Services LLC - Formed 11/23/2005	Delaware
Perspecta State & Local Inc. - Incorporated 6/26/1997	Illinois
Ultra Second VMS LLC - Formed 10/9/2017	Delaware
Perspecta Engineering Inc. - Incorporated 10/11/2010	Delaware
Perspecta Services & Solutions Inc. - Incorporated 9/23/2005	Delaware
PhaseOne Communications, Inc. - Incorporated 11/22/1999	Delaware
Perspecta Labs Inc. - Incorporated 7/13/2011	Delaware
HVH Precision Analytics LLC - Formed 11/12/2016	Delaware
KGS Holding Corp. - Incorporated 3/30/2009	Delaware
Perspecta Risk Decision Inc. - Incorporated 11/1/2000	Delaware
QWK Integrated Solutions, LLC - Formed 3/1/2012	Alabama
Dominion Technology Resources, Inc. - Incorporated 3/13/2002	Virginia
Perspecta Aerospace & Defense Inc. - Incorporated 12/11/2002	Nevada
Analex Corporation - Incorporated 10/15/2001	Delaware
Apogen Technologies, Inc. - Incorporated 10/4/2002	Delaware
Planning Systems Incorporated - Incorporated 9/1/1972	Maryland
Neptune Sciences, Inc. - Incorporated 1/17/1991	Louisiana
Westar Display Technologies, Inc. - Incorporated 3/20/2001	Nevada
SimAuthor, Inc. - Incorporated 1/22/1997	Colorado
Pimsol, LLC - Formed 6/20/2002	Alabama
ComGlobal Systems, Incorporated - Incorporated 1/6/2005	California
Beta Analytics, Incorporated - Incorporated 1/4/1984	Maryland
Science and Engineering Associates, Inc. - Incorporated 2/28/1980	New Mexico
ITS Services, Inc. - Incorporated 6/26/1991	Virginia
3H Technology, L.L.C. - Formed 3/25/1997	Delaware
3H Technology Federal Corp. - Formed 9/5/2003	Delaware

Question
9.3 Does the company disclose its beneficial ownership and control structure?
Score
2
Comments
The company is publicly listed on the New York Stock Exchange and therefore automatically receives a score of '2'.
Evidence
<p>[5] Financial Times Markets Data (Webpage) Accessed 03/04/2020 https://markets.ft.com/data/equities/tearsheet/summary?s=PRSP:NYQ</p> 

Question
9.4 Does the company publish a percentage breakdown of its defence sales by customer?
Score
0
Comments
The company does not publish the customers of at least 50 percent of its defence sales.
Evidence
<p>[9] Annual Report 2019 (Document) Accessed 03/04/2020 https://investors.perspecta.com/Cache/IRCache/984cd1e6-0d0f-34a4-b991-2987db497c13.PDF?O=PDF&T=&Y=&D=&FID=984cd1e6-0d0f-34a4-b991-2987db497c13&iid=10418483 [p.5] Defence and Intelligence Segment</p> <p>[...]</p> <p>Revenue generated from Defense and Intelligence segment customers was \$2.6 billion, or approximately 64% of our revenue in fiscal year 2019 as compared to \$1.4 billion, or approximately 50% of our revenue in fiscal year 2018. Our key Defense and Intelligence customers include the U.S. Army, U.S. Navy, U.S. Marine Corps, U.S. Air Force, and the Joint Combatant Commands. In fiscal year 2019, customers that generated more than 10% of Defense and Intelligence segment revenue include the Navy and the NRO.</p>

10. State-Owned Enterprises (SOEs)

Question
10.1 Does the SOE publish a breakdown of its shareholder voting rights?
Score
N/A
Comments
N/A
Evidence

Question
10.2 Are the SOE's commercial and public policy objectives publicly available?
Score
N/A
Comments
N/A
Evidence

Question
10.3 Is the SOE open and transparent about the composition of its board and its nomination and appointment process?
Score
N/A
Comments
N/A
Evidence

Question
10.4 Is the SOE's audit committee composed of a majority of independent directors?
Score
N/A
Comments
N/A
Evidence

Question
10.5 Does the SOE have a system in place to assure itself that asset transactions follow a transparent process to ensure they accord to market value?
Score
N/A
Comments
N/A
Evidence

List of Evidence & Sources

No.	Type (Webpage or Document)	Name	Download Date	Link
01	Documents	The Standard	02/04/2020	https://perspecta.com/sites/default/files/2019-07/perspecta_CoC_layout_Digital_040219.pdf
02	Document	Audit Committee Charter	03/04/2020	https://investors.perspecta.com/Cache/IRCache/9294427b-861d-5afa-4326-97246fcac1e8.PDF?O=PDF&T=&Y=&D=&FID=9294427b-861d-5afa-4326-97246fcac1e8&iid=10418483
03	Webpage	Ethics	03/04/2020	https://perspecta.com/about-us/ethics-and-social-responsibility
04	Webpage	Contingent Worker Code of Conduct	02/04/2020	https://perspecta.com/sites/default/files/2018-11/CW%20code%20of%20conduct.pdf
05	Webpage	Financial Times Markets Data	03/04/2020	https://markets.ft.com/data/equities/tearsheet/summary?s=P RSP:NYQ
06	Document	Supply Chain and Procurement Terms and Conditions	02/04/2020	https://perspecta.com/sites/default/files/2020-01/PERSPECTA%20ENTERPRISE%20SOLUTIONS%20General%20TC%20Rev.%205%2012202019%20v2.pdf
07	Document	Form 10K March 2019	03/04/2020	https://investors.perspecta.com/Cache/IRCache/3d6fc145-82a0-24a2-a412-f5d3fba2321b.pdf
08	Webpage	Perspecta Ethics Channel	03/04/2020	https://secure.ethicspoint.com/domain/media/en/gui/49698/index.html
09	Document	Annual Report 2019	03/04/2020	https://investors.perspecta.com/Cache/IRCache/984cd1e6-0d0f-34a4-b991-2987db497c13.PDF?O=PDF&T=&Y=&D=&FID=984cd1e6-0d0f-34a4-b991-2987db497c13&iid=10418483
10	Document	FAQ EthicsPoint	03/04/2020	https://secure.ethicspoint.com/domain/media/en/gui/49698/faq.pdf
11	Document	Assessment Begin Checklist	16/04/2020	https://perspecta.com/sites/default/files/2019-06/ABC-Perspecta.doc