

Standards of Ethics and Business Conduct



CACI

EVER VIGILANT

Message from the President and Chief Executive Officer

Dear colleagues:

Adherence to the highest business ethics, integrity, and corporate governance is key to the success of any company, but for a trusted government partner like CACI, it is imperative.

Unwavering character has long defined our company, our people, and CACI's commitment to practicing the highest possible ethics in the pursuit and performance of our company's business.

We are guided by our corporate policy statement. Issued and administered at the executive level, the statement clearly and succinctly delineates the company's philosophy, responsibilities, and authorities for assuring compliance with the policy.

CACI's Standards of Ethics and Business Conduct goes even further, laying out in detail the basis of our ethical principles and practices for our business. These standards should be practiced by every CACI employee and contractor; they are consistent with all we have said and done in the past in terms of high ethical standards.

Since no document can provide specific guidance for all situations encountered in daily business operations, CACI encourages employees to bring any questions regarding the interpretation of these standards or concerns regarding compliance to the immediate attention of their supervisor or manager, or, if the employee prefers, to Human Resources. The CACI Hotline also is available 24 hours a day at 1-800-928-3505 to confidentially report potentially illegal, unauthorized, or inappropriate conduct. In addition, we have established the CACI Accounting Hotline at 1-866-839-8686 for employees to report suspected violations of corporate accounting policies, practices, and controls, or auditing policies and practices.

It is the obligation of every CACI employee and contractor to uphold the ethical principles and business practices outlined in this document. Manager oversight of employee execution and adherence to these standards is also vital. For decades, we have been known and respected as a company of high ethical standards and business practices. Our continued vigilance is required as we work together to protect CACI's stellar reputation.



John Mengucci
President and Chief Executive Officer
April 2023

Being **Ever Vigilant** means something to us and to those we serve:

To our customers ... it means we are committed to their success.

To our employees ... it means we are never complacent.

To our shareholders ... it means we deliver performance and accountability.

To our culture ... it is who we are.



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About the **Standards**

Responsibility/Accountability

These Standards of Ethics and Business Conduct (the “Standards”) apply to all officers, employees, and contractors of every CACI company and business unit and to all business activities of CACI within CACI’s U.S. operations.

We are all responsible for upholding our own reputation and that of CACI. You are responsible for ensuring that your own conduct and the conduct of those whom you observe (and, if you are a supervisor, the conduct of those who report to you) is honest and ethical at all times and complies not only with the law but also with our policies and these Standards. Because our reputation for high ethical standards is so important, violations of any of these Standards or CACI policies will be the basis for disciplinary action, including but not limited to termination.

It is your personal responsibility to read, understand, and comply with these Standards. If you have any questions regarding specific policies, discuss them promptly with your immediate manager or higher-level manager. You may also contact Workplace Relations or the Legal Department for clarification. You will be required to certify to your understanding of these Standards on an annual basis.

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About the Standards

CACI's Commitment

Given the complexities of today's business environment, including government contracting and international business concerns, CACI, through its Leadership Team and Board of Directors, commits to full compliance with both the letter and spirit of all the applicable laws in the areas and locations in which we do business, to provide a clear set of policies and standards.

Managers have an important role as the first point of contact for employees who are concerned about safety or misconduct. It is the responsibility of CACI management and supervisory personnel to set a positive example and promote a culture of ethical conduct by ensuring that employees feel comfortable asking questions and raising concerns. Managers shall ensure that these Standards are implemented in their areas of control and are required to report violations or suspected violations.

The Company's Commitment to Comply with Mandatory Reporting Obligations

Federal contracting requirements, including but not limited to the Mandatory Disclosure rules set forth in the Federal Acquisition Regulation (FAR), may require, among other things, government contractors and subcontractors to monitor, identify, investigate, and timely disclose, when detected, certain kinds of improper conduct, including, but not limited to:

- Human trafficking
- Data breaches involving personally identifiable information
- "Credible evidence" of
 - a violation of Federal criminal laws relating to fraud, bribery, gratuities and conflicts of interest,
 - significant overpayment(s), or
 - false claims to the government

It is long-standing policy for all CACI employees to conduct business with honesty and integrity and in compliance with applicable federal, state, and local laws and regulations. You are required to embrace CACI's commitment to ethical business practices and fully support CACI's compliance program.

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About the Standards

How to Report Violations

We are committed to maintaining a workplace in which we all feel valued and fairly treated and where all actions are in accordance with law, CACI policies, and these Standards. We provide many avenues through which employees can make complaints and/or bring attention to problems in the workplace. It is the responsibility of every employee or contractor to promptly disclose any activity that is or may be in violation of these Standards or any applicable laws, rules, or regulations.

For this purpose, CACI has established the following potential contacts for reporting violations:

- **Immediate Supervisor**
- **Human Resources**
- **Legal**
- **CACI Hotline 1-800-928-3505** – This hotline, available 24 hours a day, is intended for reports of any kind of inappropriate conduct.
- **CACI Accounting Hotline 1-866-839-8686** – This hotline is intended for reports of concerns associated with accounting policies and practices, internal controls, and auditing policies and practices.

Any complaint or report received will be taken seriously and handled as confidentially as possible consistent with investigating and resolving the matter. In conducting an investigation, CACI will make findings and take appropriate action to address any improper conduct. Please help us maintain a workplace we all can be proud of by reporting such incidents.



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About the Standards

Non-Retaliation

CACI is committed to providing a workplace conducive to open discussion of its business practices. It is CACI policy to comply with all applicable laws that protect employees against unlawful discrimination or retaliation in response to their lawfully reporting information alleging inappropriate conduct in the workplace. If an employee is uncomfortable coming forward, that employee may report a concern anonymously through the CACI Hotline; however, employees are encouraged to share their contact information so that CACI may conduct a more thorough investigation.

Employees who file reports or provide evidence which they know to be false will not be protected by the policy statement above and may be subject to disciplinary action, including termination.

Investigation of Misconduct

CACI may use any lawful method of investigation which it deems necessary to determine whether any person has engaged in conduct, which, in its view, is inappropriate or interferes with or adversely affects its business. Every employee and contractor must cooperate fully with any investigation of any violation of law, CACI's policies, or these Standards.

Accountability is a core value of CACI. Employees who fail to abide by CACI's Standards of Conduct may be subject to disciplinary action, regardless of the status or title of such employee. Contractors who fail to abide by these Standards may be terminated.



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Legal Compliance



CACI Workplace Environment

CACI is committed to the safety and health of our employees and establishing a respectful workplace for how we treat each other. The company provides employees with opportunities to prosper without regard to their race, color, creed, religion, sex, sexual orientation, gender identity, age, national origin, citizenship status, physical or mental disability, marital, pregnancy, veteran status, or any other protected status.

Our policy is to provide a work environment free from all forms of discrimination and harassment, including sexual harassment. It is against CACI policy for any employee or contractor, of any gender, to sexually harass another employee.

CACI's Harassment Policy can be found in the Policy and Procedure Manual (the "Manual") at Procedure [03.08.01.03](#) – Harassment, Sexual Harassment.

CACI is committed to maintaining a safe workplace. The responsibility to perform work safely and in a manner that protects the health and safety of those around us is shared by all employees. If you see a workplace injury or unsafe work environment, stop work and report the situation immediately.

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Legal Compliance



Timekeeping Policy

High ethical standards are demanded of every employee to ensure that CACI's timekeeping procedures are followed to the letter. You have a responsibility to accurately record your time on a daily basis, in accordance with CACI's official timekeeping policy and procedures. Upon being hired, you are trained on CACI's timekeeping policy and procedures, which can be found at Manual Policy [04.01.01](#) – Timekeeping. Any question or doubt should be discussed with your immediate manager or CACI's Government Compliance Group (1-703-841-7655). Any suspected violation should be reported to the Legal Department or by contacting the 24-hour CACI hotline at 1-800-928-3505.

Interference with an Audit

You and persons acting under your supervision must refrain from taking any action that misleads, impedes, or otherwise disrupts the work of either the Company's Internal Audit Department, its independent outside auditors, or a government auditor, including any action to fraudulently induce, coerce, manipulate, hinder, or mislead any auditor in any respect.

Reporting Material Developments and Complying with Internal Controls

It is your duty to fully, fairly, and accurately report financial and non-financial information and developments that could possibly have a material effect on the operations or financial condition of CACI in a timely manner to your Immediate Supervisor, the Company's Chief Financial Officer, the Chief Accounting Officer, or the Legal Department as soon as it is discovered. In addition, it is your obligation to comply with our internal control policies and procedures and our disclosure controls and procedures. You are expected to report any failure to comply with such controls and procedures as described above to the Internal Audit Department or the CACI Accounting Hotline at 1-866-839-8686, which has been established specifically for employees to report suspected violations of corporate accounting policies, practices, and controls, or auditing policies and practices.

Those employees engaged in preparation and filing of documents with the Securities and Exchange Commission and/or with public news releases or other public communications made by CACI are expected to fully, fairly, accurately, timely, and understandably disclose all information that is required in connection with such communications.

False Information and Employment

Employees shall not intentionally provide false or misleading information or intentionally omit pertinent information regarding essential background, employment history, educational credentials, or other qualifications for employment. For example, CACI considers degrees obtained from institutions that are not properly accredited to be fraudulent.

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Legal Compliance

Fiduciary Duty of Employees

CACI's greatest assets are the knowledge, ingenuity, and productivity of its employees. We benefit most from such assets when employees perform their work with the highest degree of loyalty. As such, our employees have certain fiduciary responsibilities to CACI, including the duty to place the interest of CACI and its shareholders above personal interest in any situation where they might conflict.

In light of the special trust and confidence that CACI places in its employees, these Standards require that you act with undivided loyalty and fairness toward CACI and its employees, suppliers, business partners, and existing and potential clients.

Your employment agreement also contains provisions which address your legal obligations arising out of your employment relationship with CACI. They apply during your CACI employment and, in some instances, after your employment with CACI ends. In this regard, your post-employment obligations are not intended to prevent you from competing lawfully and fairly with CACI following the end of your CACI employment nor from engaging in subsequent employment in any field of your choice.

By way of example, below is a list of actions which would be contrary to your fiduciary and legal duties to CACI:

- Permitting the use of your name or resume by another entity in any bid, any response to a request for proposal, or any other similar application for a contract or task order that competes against CACI for new work; or is intended to replace, succeed, supersede, reduce, or diminish CACI's work under a contract or task order
- Taking kickbacks in exchange for entering into contracts
- Conducting or planning to begin a new, non-CACI enterprise while an employee and carrying out the enterprise or preparations for a new enterprise on CACI time
- Working on behalf of another entity while a CACI employee
- Using trade secrets or confidential or proprietary information in an unauthorized manner
- Disclosing any confidential information or facilitating such disclosure or use by anyone else
- Soliciting CACI's customers or employees
- Taking opportunities that are discovered through the use of corporate property, information, or position for your own personal gain

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Legal Compliance

Conducting International Business

As CACI expands its international business, it is critical that CACI employees be mindful of complying with both U.S. laws and the foreign laws governing the places where CACI is conducting its international business activities, as well as import and export regulations relating to shipment of hardware, software, and technical data and information. The broad principles expressed in these Standards apply to CACI's international business as well as domestic business that requires performance abroad. The following U.S. laws particularly apply to CACI's international business activities and must be strictly observed:

CACI strictly complies with all applicable anti-bribery and anti-corruption laws and regulations. Prominent among these is the U.S. Foreign Corrupt Practices Act (FCPA), which prohibits directly, or through an agent or intermediary, giving, offering, or promising anything of value to foreign government officials to influence a decision to obtain, retain, or direct business or otherwise improperly secure a business advantage for CACI. The FCPA also imposes civil liability on a company that does not keep accurate accounting records or knowingly fails to implement adequate accounting controls. Please contact the Legal Department or the Global Trade Compliance Office if you have any questions regarding a payment to a foreign person or entity.

Numerous export control and economic sanctions laws and regulations apply to the export of materials, equipment, weapons, technology, data, software, information, and services ("items") to foreign governments, businesses, and individuals. Export controls may also restrict

the sale of items to U.S. companies abroad and foreign corporations in the U.S. Applicable export control and economic sanctions laws and regulations include: the U.S. Department of the Treasury's Foreign Assets Control regulations, the U.S. Department of State's International Traffic in Arms Regulations (ITAR), and the U.S. Department of Commerce's Export Administration Regulations (EAR). Prior to the transfer of any item outside of the United States or to a foreign company within the United States, consult CACI's Global Trade Compliance Office for a full review of the matter in accordance with applicable export laws and requirements.

The restrictions on exports also apply to what is called a "deemed export." A deemed export occurs where export-controlled data or items are disclosed to a foreign national (including those who may work for CACI), a CACI coworker, or a customer, even if the disclosure takes place within the United States. If you have foreign nationals working on your project or with your customer, please take care to ensure that they are not exposed to restricted data or items.



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Company **Information** and **Assets**

Use and Protection of Company Assets

You are responsible for the protection and appropriate, efficient use of CACI and CACI client assets. CACI and CACI client assets include physical assets as well as intellectual property and confidential information. All CACI and CACI client assets are to be used for legitimate business purposes only in accordance with applicable policies and procedures. Theft; careless, inappropriate or negligent use; or loss of CACI's and CACI clients' physical assets, as well as unauthorized disclosure or transfer in the case of CACI's or a CACI client's intellectual property and confidential information, may subject you to disciplinary action up to and including termination. Where appropriate, CACI may refer information regarding any such action to law enforcement authorities.

Use of Software

Except for software supplied by a client, contractor, or teaming partner pursuant to the terms of a contract, you shall use only CACI-licensed software. You should never accept third-party software without a written license governing its use. You shall use all software only in accordance with the terms of CACI's license agreements or other contracts under which the software is supplied. CACI-licensed software may not be copied or provided to any third party unless authorized under CACI's license agreement. Before taking any action to transfer CACI-licensed software, you should contact the CACI Enterprise Services (CES) Department to determine whether your proposed action is permitted. Unauthorized use, copying, transfer, or disclosure of software may subject the offender to disciplinary action as well as civil and criminal penalties under copyright laws.

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Company Information and Assets

Protection of Intellectual Property, Trade Secrets, Confidential Information

It is essential for you to safeguard CACI's trade secrets and confidential information and to refuse any improper access to trade secrets and confidential information of any other company or entity, including our competitors. CACI's proprietary information must not be discussed with others within CACI, except on a strict need-to-know basis. If there is a need to disclose CACI trade secrets or confidential information to any person outside CACI, it must be done only in conjunction with a written non-disclosure agreement provided by the Contracts or Legal Department. Always be alert to avoid inadvertent disclosures that may arise in social conversations or in normal business relations, and do not receive any such information from other companies or people, except pursuant to written agreement. Similarly, CACI's property rights in its technology and products must be protected by use of appropriate agreements whenever such technology and/or products are used, transferred, or disclosed. Contact the Contracts or Legal Department for an appropriate agreement.

Electronic Communications and Acceptable Use of Computer Resources

CACI policy regarding electronic communications and acceptable use of computer resources can be found at Manual Policy [08.11.02](#) – Electronic Communications & Acceptable Use of CACI IT Assets.

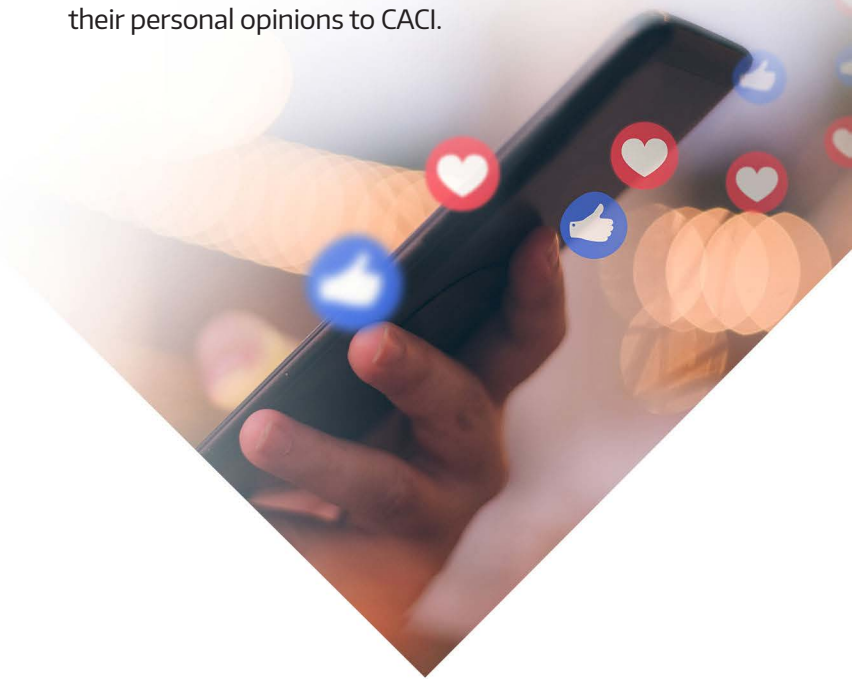
Data Privacy and Data Protection

It is incumbent on CACI and its employees to safeguard any personal data in its possession, including that of employees, customers, or contractors. The loss, theft, or improper modification of data or the unauthorized access of IT systems can result in significant liability for CACI. Personal data may only be accessed to the extent necessary to fulfill a legitimate business purpose.

When creating or handling personal data, you are responsible for ensuring that information created is appropriately marked and stored, shared with appropriate and authorized persons, and properly destroyed or deleted.

Social Media

CACI's brand and reputation are valuable assets. Our employees are expected to conduct themselves in a manner that reflects CACI's values. Use your best judgment before posting content on social media. Do not post CACI proprietary information or information that could create a security risk for yourself or another individual; employees should also refrain from attributing their personal opinions to CACI.



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Conflicts of Interest

Conflicts of Interest

A “conflict of interest” occurs when a person’s private interest (financial gain, career development, familial interest, reputation advantage, etc.) interferes in any way – or even appears to interfere – with the legitimate business interests of CACI. It is not practical to attempt to list all possible kinds of conflicts. Nonetheless, employees should be very conscious of the potential for their own interests, or those of their immediate family, to be in conflict with CACI’s interests, and should take care not to act in a way that prefers those personal interests over CACI’s interests or our customer’s interest when they do conflict.

If you are working under a government contract, you may also be subject to government rules regarding personal conflicts of interest. This will depend on your specific job responsibilities. If applicable, an explanation of the rules and your obligations under the law will be provided to you by your manager.

In order to avoid potential conflicts of interest, you should avoid any activity outside your employment that is reasonably likely to put you in a conflict situation. For example, it is important to avoid engaging in activities outside of your CACI employment for entities that provide products or services that may be competitive with the products or services provided by CACI. If in doubt whether a situation or certain activity constitutes a conflict of interest, contact the Legal Department for guidance.

CACI itself may experience a conflict of interest when an employee has unequal access to customer or competitor information; has had input into a government solicitation; or is in a position to evaluate other products or services sold by CACI.

If such “organizational conflicts of interests” are not promptly identified and mitigated, CACI could be disqualified from immediate and future business opportunities. CACI screens all former and current government employees for organizational conflicts of interest prior to hiring. Any suspected organizational conflicts of interest must be reported to the Legal Department immediately.

CACI’s policies regarding Outside Employment and Employee Affiliations can be found at Manual Policies [03.01.04](#) – Outside Employment and [02.02.06](#) – Employee Affiliations.

Insider Trading/Tipping

Since CACI is a publicly owned company, we have legal obligations to be especially vigilant in safeguarding material, non-public Company information (“Inside Information”), from disclosure both inside and outside of CACI. It is a violation of Federal law for anyone with Inside Information to buy or sell CACI stock or to make any unauthorized disclosure of such information (known as “tipping”). Equally, if in the course of your employment, you obtain Inside Information of any other companies, such as CACI’s customers, contractors, suppliers or business partners, you may not trade stocks in those companies.

Our policy is that CACI employees with knowledge of material information about the Company that has not been disclosed to the general public must refrain from disclosing such information to anyone else and from engaging in any transaction in CACI stock until the third business day following public disclosure of such information. Always contact the Legal Department when in doubt before conducting a transaction in CACI stock. As an aid

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Conflicts of Interest

to compliance, CACI has established periodic trading blackouts each quarter. Employees who receive e-mail notification of such blackouts are required to precisely comply with the requirements of the blackout.

Certain employees (“Designated Insiders” or “Reporting Person”) and their families will have additional restrictions on the transaction of CACI stock. Those Designated Insiders are required to comply with the CACI policy regarding notice and reporting of all transactions in CACI stock. Such persons must provide notice of any planned trades to the Legal Department and the Chief Financial Officer prior to initiating the trade. If the transaction is approved, CACI will provide the designated insider with a 48-hour window to transact the sales.

Accepting Gifts, Gratuities, and Entertainment

Acceptance of gifts and gratuities from actual or would-be clients, suppliers, contractors, competitors, or business partners can result in possible conflicts between your duty of loyalty to the Company and your personal interests. In order to ensure that such situations are considered thoughtfully, if you are offered a gift or gratuity with a value exceeding \$150, you must report such offer and seek approval to accept it through your chain of command to the General Counsel.

In no event should you accept a gift where it would be prohibited by law or is known by you to be contrary to law or the corporate business practices of the company employing the person offering the gift.

CACI’s policy regarding gifts can be found at Manual Policy [02.01.02](#) – Gifts and Gratuities.

Providing Gifts, Gratuities, and Entertainment

Due to the nature of CACI’s business, the giving of gifts, gratuities, or entertainment (considered “Business Courtesies”) requires the use of good business judgment by employees and careful monitoring by managers. For commercial, non-government clients, Business Courtesies, including meals, entertainment, gifts, promotional items, services, and favors, may be extended, provided they are reasonable, not extravagant in value or number, infrequent enough not to become expected, and not offered in exchange for favorable consideration or treatment. A Business Courtesy is simply that—a courtesy—and should not be given if doing so would create even the appearance of an impropriety on CACI’s part.

CACI’s policy regarding gifts can be found in the Manual as noted above.

Dealings with Suppliers, Contractors, Business Partners, and Competitors

Integrity and fair dealing are core components of our business practices. All contractors, suppliers, other business partners, and competitors should be treated fairly and uniformly in accordance with CACI’s established purchasing policies and procedures. You must not engage in any activity prohibited under anti-trust laws, including boycotting, price-fixing, refusal to deal, price discrimination, or disparate treatment of suppliers. Paying bribes, accepting kickbacks, and obtaining and using third-party insider information in dealings with suppliers, contractors, and business partners are completely inappropriate and will not be tolerated.



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Interacting with the Government

Policies Relating to U.S. Government Contracting

As a government contractor, we have a special obligation to the U.S. Government, and to the general public, to ensure that we administer our contracts and deliver our products and services in a manner that fully satisfy both our legal obligations and our own high standards of integrity and quality.

Contracting with the U.S. Government imposes requirements not traditionally associated with purely commercial business transactions. We are committed to compliance with the letter and spirit of the laws and regulations governing U.S. Government contracting. Summarized below are a number of key requirements affecting U.S. Government contracts. Please contact your immediate manager, contracts personnel, or the Legal Department with any questions or concerns you may have regarding applicable U.S. Government contracting policies and procedures.

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Interacting with the Government

False Claims/False Statements

It is a felony to knowingly make a false claim or false statement to the government. Violations of these and other statutes can subject CACI to damaging publicity, expensive and time-consuming investigations and litigation, reduction of negotiated contract rates, and the revocation of contracts. Both CACI and individual employees may also be subject to civil and criminal sanctions, including fines, debarment or suspension, and prison sentences. Such violations also can expose an employee to discipline up to and including termination of employment.

Although it is not possible to specify here all contract-related dealings with the government that present the risk of false statements, false claims, or other violations, particular attention is called to the following:

- CACI is required to submit accounting and other records to the government as a basis for payment on existing contracts or as estimates on future work. All data must be accurate, and all estimates must be made in good faith. It is our policy to charge all labor and material costs accurately, to the appropriate account, regardless of the status of the budget for that account. Improprieties, such as charging labor or material costs improperly or to the wrong account, charging direct contract effort to an overhead or indirect account, and falsification of timecards or other records, will be grounds for disciplinary action including termination.
- CACI is frequently required to submit cost or pricing data to the government, and to certify that it is current, accurate, and complete. The definition of data that must be disclosed is very broad and includes facts as well as management decisions, estimates (based on verifiable data), and other information that a reasonable person would expect to affect the negotiations. Our policy is to provide full disclosure of complete and accurate cost and pricing data that is current up to the date of agreement on price.
- CACI submits proposals for reimbursement of indirect costs to the government. A CACI official may be required to certify their belief that the proposal does not contain expressly unallowable costs, such as advertising, donations, entertainment, fines and penalties, lobbying, defense of fraud proceedings, and goodwill. It is our policy to request reimbursement only for those indirect costs that are reasonable in amount and for which we have a good-faith belief that the costs are allowable.
- We are often required to certify compliance with quality control specifications and testing requirements for our products or services. Our policy is to deliver goods and services that meet all contract requirements and give the customer the highest degree of confidence in our work. Improprieties, such as the failure to conduct required testing or manipulation or falsification of test procedures or data, will not be tolerated.



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Interacting with the Government

Gifts and Gratuities to U.S. Government Officials

CACI employees must not offer, give, or promise to offer or give any money, gratuity, or other things of value to any government employee that such employee is prohibited from receiving by applicable law, including transportation, meals at business meetings, tickets to sporting or other events, or the like.

Even if applicable government regulations permit their acceptance, CACI employees must refrain from offering or giving or reimbursing expenses for any entertainment or offering any gratuity to any government employee who is personally and substantially involved in a procurement or administrative function relating to any contract for the direct or indirect purchase of products or services from CACI.

Federal government employees, as well as those of most state and local governments and many private companies, are subject to strict rules regarding the acceptance of gifts. CACI must respect these rules. In the government environment, the failure to do so may result in severe legal and financial consequences for CACI, the offending employee, and the government recipient. In addition, there are significant legal prohibitions associated with providing gratuities in the context of international activities. When in doubt regarding the appropriateness of a gift or extension of business courtesy, consult your immediate manager, your cognizant contracts personnel, or the Legal Department, and always err on the side of caution.

CACI's policy regarding gifts can be found at Manual Policy [02.01.02](#) - Gifts and Gratuities.

Lobbying Activities

CACI is prohibited from using federal funds to pay persons such as lobbyists or contractors to influence or attempt to influence executive or legislative decision-making in connection with the award of any contract. We are also required to furnish a certification that no federal funds have been paid or will be paid in violation of this prohibition. In addition, CACI is required to report to the government any payments to any lobbyist or contractor paid with non-federal funds for such purposes.

Though CACI does not participate in party politics, it provides its employees the opportunity to advance CACI's mission of supporting the national security needs of our nation through the non-partisan CACI Political Action Committee (CACI PAC). Employees at the Director and above level who wish to contribute may visit the CACI PAC website for more information.

Classified Information

Government information that is national security- classified, procurement sensitive, or proprietary shall not be solicited or accepted from (or provided to) any source, either directly or indirectly, in circumstances where there is reason to believe that the release is not authorized.

All classified information in CACI's possession shall be treated in strict compliance with U.S. Government- mandated procedures for such classified information.



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Interacting with the Government

Prohibited Use of Source Selection Information/Competing Contractor Cost and Pricing Information

Procurement integrity is critical to ensuring an even playing field for CACI and its competitors. CACI's commitment to integrity requires that we will not solicit or accept from any officer or employee of the agency, or any other source, any proprietary or source selection information belonging to our competitors or relating to a procurement.

Proprietary data includes information contained in a bid or proposal, cost or pricing data, and any information submitted to the Government by a contractor and properly designated as proprietary. The possession of such information may result in civil liability and/or CACI's disqualification from future opportunities.

The improper receipt of source selection information may also result in liability under the Procurement Integrity Act. Source selection information includes information designated as government sensitive, such as listings of offerors and prices, listings of bidders prior to bid opening, source selection plans, technical evaluations of proposals, competitive range determinations, rankings (except for sealed bidding), source selection board reports and evaluations, source selection advisory board recommendations, and other information determined by the head of the agency or contracting officer to be information which would jeopardize the integrity or successful completion of the procurement if disclosed.

Hiring of Government and Former Government Employees

Special concerns apply to hiring or retaining a government or former government employee as an employee or contractor of CACI, which include constraints regarding communications about possible employment of government employees, particularly those designated as "procurement officials." You shall not conduct any discussions regarding, or make any offer or promise of, future employment or business opportunity to any procurement official during the conduct of any procurement. To be sure that you do not run afoul of restrictions in this area, before discussing potential CACI employment with any government employee, contact a representative of the Legal Department for advice.

CACI's hiring policy regarding clients and government or former government employees can be found at Manual Policy [03.02.01](#) – Eligibility for Hire. There are no exceptions to this policy. Certain government employees are prohibited from receiving or discussing potential employment opportunities prior to formally disclosing their intentions to the government. Authorization from the Legal Department must be obtained before any government employees can be offered employment by CACI. In addition, any plans to employ retired military officers of general or flag rank, or civilian officials having the rank of Deputy Assistant Secretary or above, must be approved by the CACI Chief Human Resources Officer, prior to an offer of CACI employment.

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Interacting with the Government

Prohibited Contractual Relationships

CACI shall not knowingly employ an individual nor contract with a company, by any means, if the individual or company is on the General Services Administration's (GSA) Consolidated List of Debarred, Suspended, and Ineligible Contractors, nor knowingly employ an individual who has been convicted of an offense related to government contracting.

Nor will CACI knowingly contract with an individual or entity identified on the Office of Foreign Asset Control's (OFAC) "Specifically Designated" list of nationals or persons who are subject to trade restrictions.

CACI employees will immediately sever all business connection with any former employee or contractor of CACI whose conduct violates applicable laws, regulations, or basic tenets of business integrity and honesty, and such other individuals specifically identified by CACI.

Avoidance of Restrictions on Trade

CACI will not enter into a subcontract or teaming agreement that unreasonably restricts sales by the other company directly to the U.S. Government of items made or supplied by the other company and will not otherwise act to restrict unreasonably the ability of any other company to sell directly to the U.S. Government. Conversely, CACI will not enter into agreements where, as a subcontractor or teaming partner, we are subject to any unreasonable restriction to sell our products or services directly to the U.S. Government.

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Interacting with the Government

Contractor Compliance with Standards

Contractors shall be required by contract to comply with all laws and regulations relating to U.S. Government contracting and the laws of the countries in which they are operating. These Standards shall be incorporated in all contractor contracts, and each such contract shall expressly provide for termination in the event the contractor violates the laws or regulations relating to government contracting, CACI Policies, or these Standards.

Drug-Free Workplace Act Compliance

CACI fully complies with the Drug-Free Workplace Act of 1988, which was enacted with objectives of achieving a drug-free America and combating illegal drugs in the workplace. Among the Act's requirements is a provision that any contractor seeking a single federal government contract of \$25,000 or more will certify that CACI has a drug-free workplace policy, and, as a minimum, has instituted programs prescribed by law. In addition, DoD has a Drug-Free Work Force Regulation that specifies, along with other requirements, that all defense contractors institute and maintain certain programs to achieve a drug-free work force.

The policies and procedures adopted by CACI can be found at Manual Policy [03.08.04](#) – Drug-Free Workplace.

Government-Furnished Property

You are responsible for the appropriate use, maintenance, accounting for, and, when necessary, disposal of government property in compliance with government-mandated policies and procedures.

Administration and Interpretation

All questions relating to the charging of material and labor and to the allowability and reasonableness of overhead expenses should be directed to CACI's Internal Audit Department.

All other questions relating to these Standards and CACI's ethics and business practices in general should be directed to the Legal Department.

Company documents you also should be familiar with for ethics compliance are:

CACI's Policy & Procedure Manual

- **CACI's Policy [02.02.18](#)** – Reporting Compliance Issues
- **CACI's Policy [08.11.02](#)** – Electronic Communications & Acceptable Use of CACI IT Assets
- **CACI's Procedure [03.08.01.03](#)** – Harassment, Sexual Harassment
- **CACI's Policy [03.08.04](#)** – Drug-Free Workplace
- **CACI's Policy [04.01.01](#)** – Timekeeping

You may access these documents online in the CACI Policy & Procedure Manual.



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