

Procurement Ethics Policy

October 2023

I. Ethics

All Procurement personnel must be ethical and fair in their business interactions with potential and existing vendors. This includes complying with Mathematica's Code of Business Ethics and the Employee Handbook. If you believe these policies are being compromised in any way, it is your responsibility to raise the concern immediately with management.

- **Fair competition**—Procurement personnel should have the best interests of Mathematica in mind when conducting business, and Mathematica's interest is best served by competitive activity. All purchases should be based on considerations of suitability, quality, service, timeliness, price, and efficiency.
- **Relationships with vendors**—Mathematica expects its associates to be fair to its vendors. Our policy is to award orders, contracts, and commitments to vendors based on merit, without favoritism.
- **Procurement personnel** may not channel any Mathematica business to themselves, to a family member, or to another entity in which they have a personal interest.

If you believe that a family member or an entity in which you have a vested interest can offer the best goods or services to Mathematica, you must ask your supervisor for the opportunity to provide a competitive bid, disclose your relationship in writing in that request, and ask to be excluded from the decision-making process. (A copy of the request must also be sent to the director of procurement and to a vice president.) This will remove any appearance of a conflict of interest and will enable an independent third party to make the decision.

- **Conflicts of interest**—Procurement personnel may not allow their personal interests and activities with vendors, customers, other associates, or the public to conflict or appear to conflict with Mathematica's ethical principles and practices. Personnel are also required to review and sign an annual conflict of interest statement.

This supports Mathematica's standards of business ethics and human resources policies.