





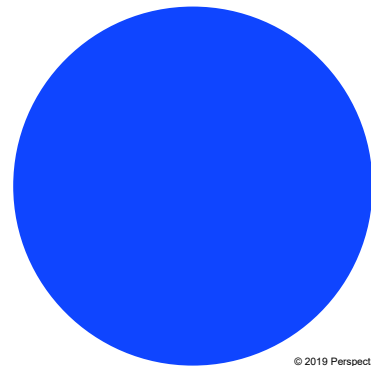
The first, best chance: Post-merger ethical culture building

Challenges, opportunities and lessons

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Agenda



The merger

A new company

Ethical culture

**Ethics and
compliance
program**

The Standard

Perspecta's code of conduct

**Code of conduct
training**





Going forward

 **perspecta**

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The merger

Rich pedigree		Mission expertise		
	<ul style="list-style-type: none">EDSHewlett Packard	50+ year legacy delivering next-generation solutions to a broad set of federal agencies	2.5B Intrusion attempts prevented per year for the US Navy	1B+ Medicare claims processed per year
	<ul style="list-style-type: none">GE AerospaceLockheed MartinBellcore	Deep intimacy built upon critical mission partnership, in some cases since agency inception	#1 Provider of systems engineering services for intelligence community	1st Cloud migration supported in intelligence community
	<ul style="list-style-type: none">Kroll	Government's largest investigative services provider with a relationship that spans over a decade	200k+ Background investigations conducted per year	
				

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Merger plan: Day 1

- Mission and values
- Ethics and compliance program
 - Code of conduct
 - Helpline
 - Case management system
 - Ethics policy (Policy #1)

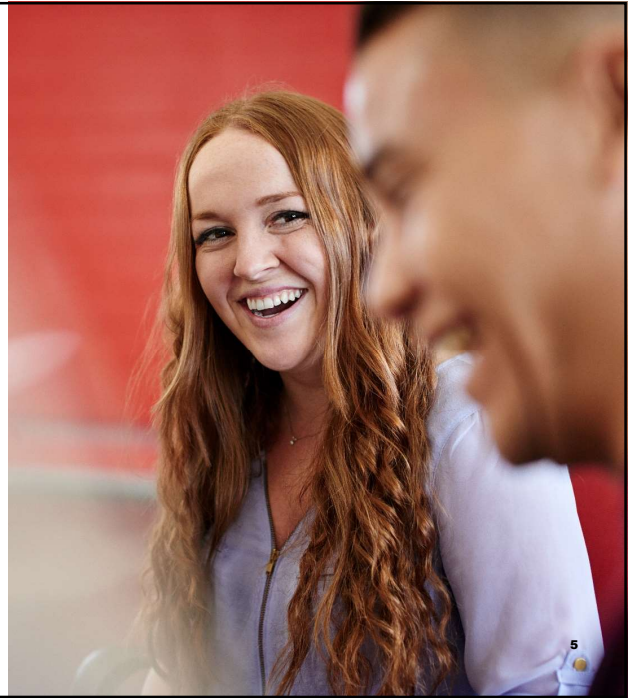


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Organizational values initiatives

- Support for mission, purpose
- Keystone to culture (including ethical culture), including an aspirational culture
- As extension of founders
- Touchstones for decision-making
- Reflective vs. aspirational
- Development of initial values
- Values management
- Roles in ethics and compliance programs

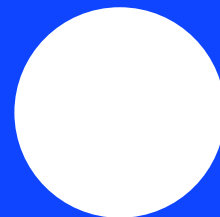


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The standard plays a critical role in the implementation of our mission and most prominently our values by outlining concrete behaviors that are expected from us all.



Mac Curtis
President and Chief Executive
Officer of Perspecta



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Mission and values

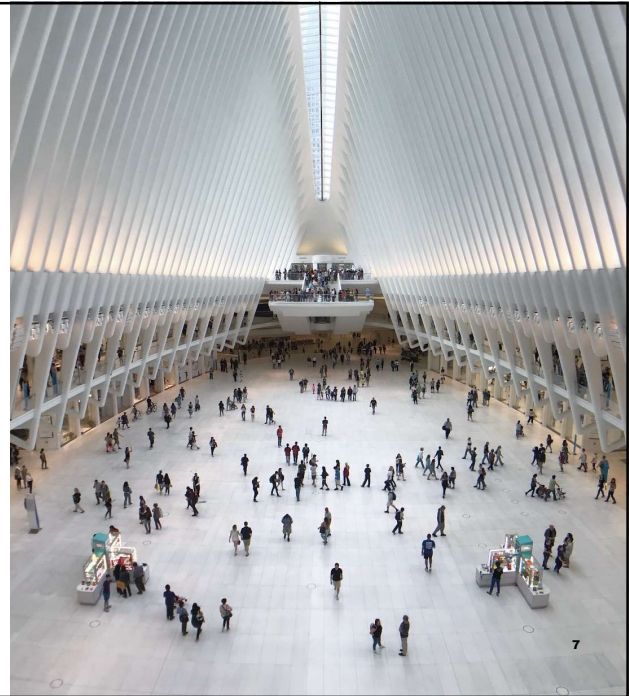
Our purpose:

We strengthen our nation and improve the lives of its citizens by solving the most demanding national security and information-related challenges through unparalleled expertise, innovation and commitment.

Our values:

- **Respect:** We treat each other with respect
- **Accountability:** We are accountable for our actions
- **Integrity:** We demonstrate integrity in everything we do
- **Success:** We bring our customers success through mission focus, commitment and innovation
- **Empowerment:** We are empowered to drive results

We **RAISE** the bar!



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Ethical culture

- What is ethical culture?
- Identifying ethical culture
- Assessing ethical culture
- Strengthening and sustaining ethical culture



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Ethical culture at Perspecta

- Very deliberate process
- Industry issues
- Leadership's focus
- Ethics and compliance program's role
- Employee survey



*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.*

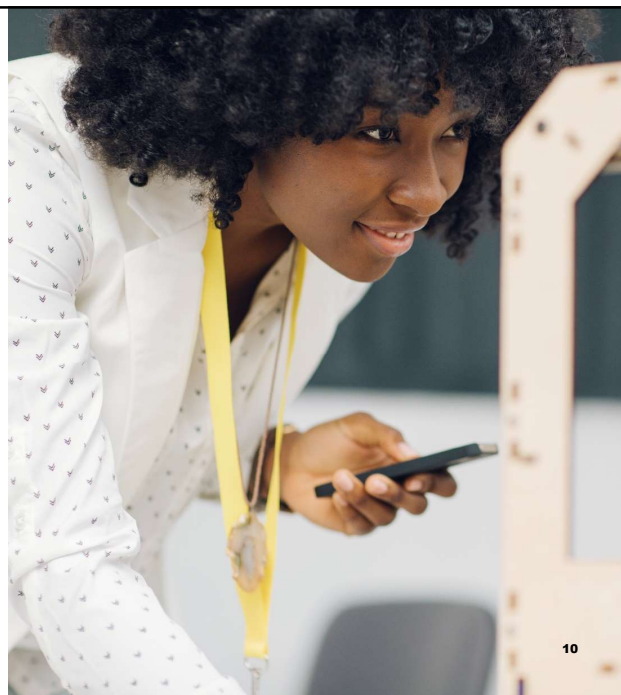
Sarah Lynn, Chief Ethics and Compliance Officer

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Ethics and compliance program

- Code of conduct
- Policies
- Communications
- Training
- Helpline
- Investigations
- Corporate ombudsman
- Government investigations/inquiries



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Codes of conduct

- Rules-based to values-based/guidance
- Resources guide
- Versions (geography, business)
- Brand identity/marketing the business
- Web/technology-enabled, including mobile-enabled
- Training and communication



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Perspecta's code of conduct

- Bringing together three company cultures
- Role of ethics at Perspecta

Code development

- Legacy codes
- Industry benchmarking

Features

- Title/theme; support for missions/values
- Leadership message
- Inclusive, affirmative tone
- Decision tools

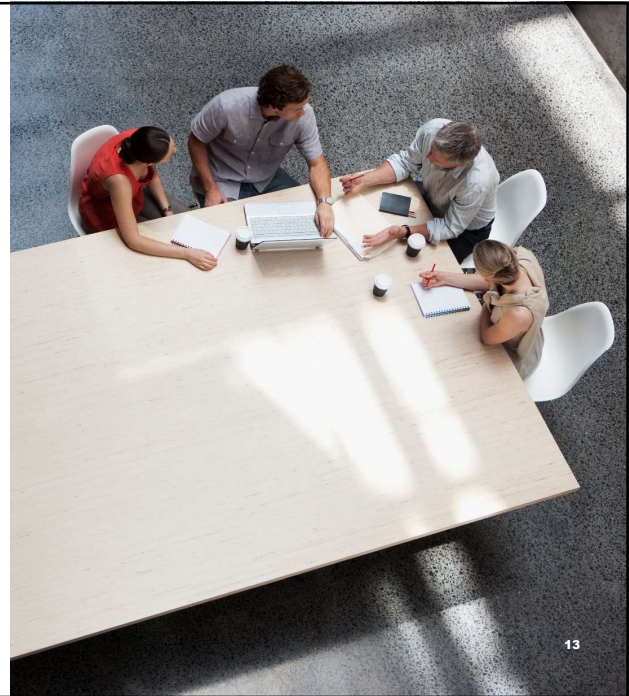


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Code of conduct training

- Purpose vs. other ethics and compliance training
- Annual training
- Training for new hires
- Annual message
- Priority of risk topics
- Versions



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Perspecta's code of conduct training

Features

- Conceptual and principled
- Situation-based learning
- Interactive instruction
- Balanced content
- Competency focused
- Multimedia-rich
- Accessibility compliant
- Contemporary design

Content

- Flexibility principle
- Leadership message
- Introduction to values/E&C program
- Modules
- Code attestation
- Summary
- Quiz

Versions

- Manager vs. non-manager



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Year 1: code of conduct training

Manager version

- Teaser video
- Welcome (CEO Mac Curtis)
- Our Values and code
- **Manager core competencies**



Non-manager version

- Teaser video
- Welcome (CEO Mac Curtis)
- Our values and code
- **Employee core competencies**



- Diversity and inclusion
- Anti-harassment
- Financial integrity
- Inside information and insider trading
- Conflicts of interest
- Fair competition
- Gifts, hospitality and entertainment
- Working with third parties
- Code and acceptance
- Quiz

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Training experience

- Employee comments
- Board member comments
- Completion rate and process to encourage

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Role of code and training in

- Ethics and compliance program
- Ethical culture



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Year 2 plans

- Training
- Other methods of learning (Ethical Snapshots, etc.)
- Ethics ambassadors at a larger installations
- Government contracting code of conduct
- Focus on "inside threat"
- Civil and respectful workplace



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Thank you

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