

# → ICF Supplier Code of Conduct





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## A message from our CEO

John Wasson  
Chair and Chief Executive Officer

Dear Partners:

ICF firmly believes that trust is key to our business. We provide professional services, and the effectiveness of our work stems from personal relationships and trust. Building trust is not achieved by just one person or company, however. ICF and our business partners must share a commitment to operating with integrity and transparency to maintain long-term relationships of trust.

Our philosophy has been—and always will be—to sustain the highest possible business ethics and to uphold the laws where we operate. This Supplier Code of Conduct provides a guide to the ethical principles that we expect our partners to uphold. I am confident that, together, we can perform our work in a way that sustains the ideals exemplified here.

This Supplier Code of Conduct (“Code”) reflects the standards of conduct required of ICF’s subcontractors, vendors, suppliers and other business partners. The terms and conditions contained herein are in addition to, and are not intended to conflict with or modify, the terms and conditions of any subcontract, purchase order or other applicable agreement (“Agreement”). In the event of any conflict, applicable law or regulation shall take precedence, followed by the terms and conditions of any Agreements (including other attachments thereto), followed by the terms of this Code.

ICF expects our suppliers to have their own written codes of conduct that align with the principles contained in this Code and ICF’s [Code of Business Ethics and Conduct](#); these principles should flow down to a supplier’s own subcontractors and suppliers. By acceptance of any Agreement, supplier agrees to the following standards of conduct.

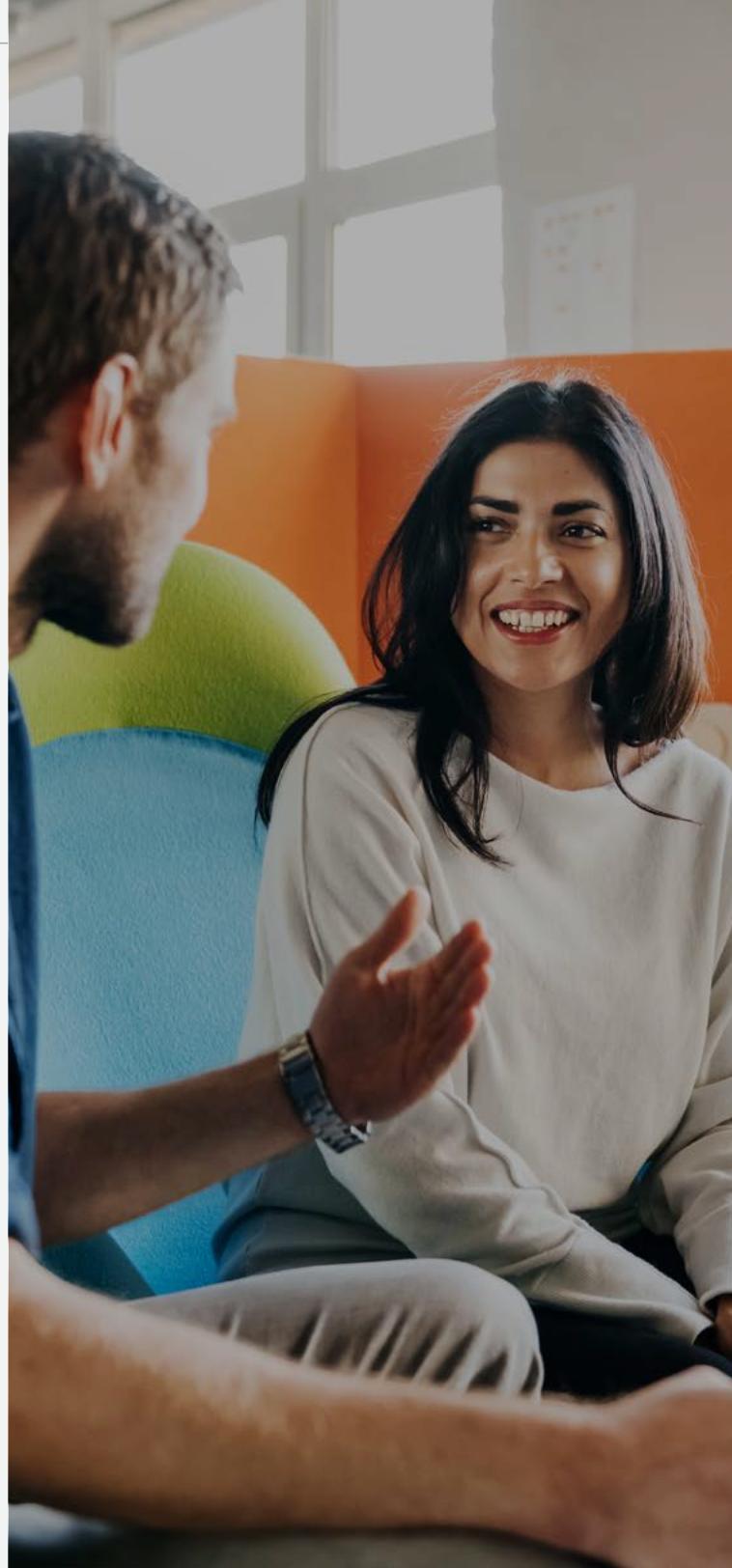
## I. Follow the law

Suppliers must obey all applicable laws and regulations. Suppliers are responsible for being familiar with the laws governing their business activities, including local laws and regulations outside the United States where the supplier conducts business or maintains a place of business, division, group, or department leader.



## II. Respect in the workplace

- A. Respect for each other and equal employment opportunity.** We expect our suppliers to respect all backgrounds and perspectives and treat their employees and applicants for employment equally, regardless of race, color, religion, national origin, sex, sexual orientation, age, medical condition, physical or mental disability, veteran status, or any other status protected by applicable laws.
- B. Harassment.** Harassment is a form of discrimination and consists of unwelcome conduct, whether verbal, physical, or visual. We expect our suppliers to encourage a harassment-free work environment and exercise good judgment in their business relationships. We expect our suppliers to safeguard and seek to prevent harm to people caused by harassment, bullying, sexual exploitation or abuse. our suppliers to encourage a harassment-free work environment and exercise good judgment in their business relationships. We expect our suppliers to safeguard and seek to prevent harm to people caused by harassment, bullying, sexual exploitation or abuse.
- C. Safety, health and environment.** We expect suppliers to be committed to a safe work environment. Suppliers have a responsibility to establish safety and human resources procedures that promote safety, as well as compliance with applicable laws designed to promote workplace safety, including health and safety, environmental, and labor standards.



- D. Workplace violence.** We expect our suppliers to take a zero-tolerance approach to any form of violence, threat of violence, or perceived threat of violence.
- E. Drug-free workplace.** We expect our suppliers to promote a working environment free of the problems associated with drug and alcohol abuse.
- F. Freedom to associate.** We expect our suppliers to allow workers to associate freely and establish labor unions and express grievances regarding employment or working conditions to management without fear of retaliation.



### III. Build trust with clients and partners

- A. Client billing and time.** Suppliers are responsible for ensuring that all claims and statements submitted to clients, including government clients, are truthful and not misleading.
- B. Working hours, wages, and benefits.** Suppliers must comply with laws regarding working hours, break periods, overtime, and minimum wage or local industry standards.
- C. Conflicts of interest.** We expect our suppliers to avoid all actual, potential, or perceived conflicts of interest in their dealings with ICF. In the event an actual, potential, or perceived conflict of interest arises, we expect our suppliers to notify ICF and all

affected parties. This includes both organizational and personal conflicts of interest (including interests of employees or their immediate family).

- D. No bribes.** Our suppliers must not pay or accept bribes – or anything that may look like a bribe. We expect suppliers to conduct business with integrity and in full compliance with applicable laws, including, but not limited to, the Foreign Corrupt Practices Act (FCPA), the U.K. Bribery Act (UKBA), and all other anti-corruption laws that apply in jurisdictions where they work.
- E. Gifts, meals, and entertainment.** The purpose of gifts in a business setting is to create good will and

sound working relationships, not to gain an unfair advantage. A “gift” (sometimes called a “business courtesy”) is anything of value, including goods, services, favors, meals, trips, hospitality, and sports or entertainment tickets. We expect our suppliers to ensure that any offering or acceptance of gifts is permitted by law or regulation, customary business practices, as well as the recipient’s organization’s rules.

- F. Avoidance of restrictions on trade.** We expect that our suppliers conduct themselves and their business in such a manner as to be in compliant with all antitrust (competition) laws that prohibit monopolies and agreements that unreasonably restrict trade.

### IV. Build and protect value

- A. Protect intellectual property.** We expect our suppliers to protect intellectual property – whether ICF’s, the client’s, or a third party’s – and comply with all applicable laws governing the use, disclosure, and protection of intellectual property, including patents, copyrights, and trademarks.
- B. Protect information.** We expect our suppliers to properly protect sensitive information, including confidential, proprietary, and personal information. Information should only be used for the business purpose for which it was provided.

**C. Accurate records and financial integrity and reporting.** We expect our suppliers to maintain financial records that are full, fair, accurate, and understandable. Suppliers are expected to cooperate with ICF in the event of a review or audit of financial records relating to suppliers’ engagement with ICF.

**D. Fraud.** Fraud prevention is everyone’s responsibility. Participating – no matter how small the role – in an activity that involves theft, fraud, embezzlement, extortion, or misappropriation of assets is never acceptable. ICF relies on its employees and our partners – including our suppliers – to recognize red flags that signal fraud and report it.

**E. Insider trading.** During the course of work for ICF, suppliers may have access to important, material non-public information about ICF and our clients, vendors, business partners or competitors (“insider information”). Suppliers are not permitted to use such information as the basis for buying or selling stock (or provide stock “tips” to others).



## V. Serve our community and work responsibly

- A. Sanctions, import and export controls.** We expect our suppliers to be knowledgeable of all applicable international trade regulations that prohibit ICF or our suppliers from doing any business in certain countries or with organizations or individuals, as well as applicable laws, regulations, and directives governing the import or export of materials, technology, data, software, information, and services. Suppliers must ensure that their business practices are in accordance with these.
- B. Boycotts.** Suppliers must not participate in any activity that could have the effect of promoting a boycott or restrictive trade practice fostered by another country against customers or suppliers located in a country or against a U.S. person, firm, or corporation.
- C. The environment.** ICF is committed to reducing the impact of our operations on the environment and providing a healthy workplace for our employees, as described in ICF's corporate citizenship priorities. We encourage our suppliers to be environmentally aware when performing work and traveling for ICF.



- D. Responsible use of AI and advanced technologies.** In the use of AI and other technologies, we expect our suppliers to commit to the principles of Human-centricity, Protection of Rights, Transparency, and Fairness and the company's approach to AI use grounded in fairness and ethics, as outlined in ICF's [Responsible AI Principles](#).
- E. Upholding human rights and fair labor, combating trafficking in persons and child labor.** We expect our suppliers to uphold human rights in the workplace and within their sphere of influence—as outlined in United Nations guidance, Human Rights Translated. We expect our suppliers to take a zero-tolerance policy regarding employees who engage in or support trafficking in persons, the use of forced labor, or the procurement of any sex act where anything of value is given or received in exchange. We expect our suppliers to safeguard and seek to prevent any harm to vulnerable populations they may encounter in their business activities, including child workers. Suppliers must certify compliance with ICF's [Statement and Plan on Human Trafficking and Modern Slavery](#). We expect our suppliers to abide by all working age laws and wage and hour laws in the applicable jurisdictions.

## VI. Ethics and compliance program

- A. We expect our suppliers to provide their employees with avenues for raising legal or ethical concerns without fear of retaliation. We expect our suppliers to take action to prevent, detect, and correct any retaliatory actions.
- B. ICF reserves the right to pursue corrective action to remedy any violation of these standards, up to and including the right to terminate the Agreement in place with a supplier. In the case of a violation of law or regulation, ICF may be required to report the violation to the proper authorities. ICF can audit the supplier at any time to ensure compliance with the standards in this Supplier Code of Conduct.
- C. If a supplier believes that ICF or any of its employees or agents has acted in violation of the ICF Code of Business Ethics and Conduct or of any law or regulation applicable to ICF's business, you may report to:

ICF's Compliance Committee, at [ComplianceCommittee@icf.com](mailto:ComplianceCommittee@icf.com)

ICF's Ethics Hotline at **+1.844.641.5874** (U.S.) or visit <https://icf.ethicspoint.com> for direct dial options from non-US global locations.



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ICF (NASDAQ:ICFI) is a global consulting and technology services company with approximately 9,000 employees, but we are not your typical consultants. At ICF, business analysts and policy specialists work together with digital strategists, data scientists and creatives. We combine unmatched industry expertise with cutting-edge engagement capabilities to help organizations solve their most complex challenges. Since 1969, public and private sector clients have worked with ICF to navigate change and shape the future.