

December 2020

Holiday Guidance to Suppliers and Vendors

Dear Suppliers and Potential Suppliers:

Magellan Federal is committed to maintaining the highest standards of business conduct and procurement integrity by Company employees engaged in the procurement process and to provide personnel direction and guidance in the conduct of all procurement operations. This commitment extends to our suppliers of products and services. At this time of year, we especially desire to ensure our suppliers are aware of the importance of recognizing and complying with the Magellan Federal “Supplier Code of Conduct.”

Our employees are not permitted to receive gifts from suppliers that could inappropriately influence business decisions or gain an unfair advantage. Our Supplier Code of Conduct provides your company with guidance on doing business with Magellan Federal. Our Supplier Code of Conduct includes the opportunity for our suppliers to compete fairly while complying with our policy regarding gifts, entertainment and potential conflicts of interest.

### **Gift/Business Courtesies**

We expect our Suppliers to compete on the merits of their products and services. The exchange of business courtesies may not be used to gain an unfair competitive advantage. In any business relationship, our Suppliers must ensure that their offering or receipt of any gift or business courtesy is permitted by law and regulation, and that these exchanges do not violate the rules and standards of the recipient’s organization and are consistent with reasonable marketplace customs and practices.


Magellan Federal has adopted and will expect its vendors and suppliers to comply with the Government Ethics Office policy which imposes limitations on bona-fide gifts to \$20 per source, per occasion, not exceeding \$50 annually<sup>1</sup>.

The Company acknowledges the requirements of FAR 52.203-13, Contractor Code of Business Ethics and Conduct, which, under the applicable criteria specified therein, requires contractors to include the substance of this clause in all subcontracts. The Company maintains a Supplier Code of Conduct Policy that can be found by accessing the website at <https://www.magellanfederal.com/suppliers/> downloading the information. The Supplier Code of Conduct Policy is incorporated in all subcontracts and purchase orders issued by the Company.

Should you have any additional questions, please reach out to Deb Lowry, Senior Manager, Federal Procurement and Subcontract Administration at [lowryd@MagellanFederal.com](mailto:lowryd@MagellanFederal.com).



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<sup>1</sup> Other restrictions apply, including the complete prohibition of general gift cards (Visa, Mastercard, AMEX gift cards), regardless of the dollar value. For more details, please refer to the Supplier Code of Conduct.