

February 19, 2025

Dear Draper Business Colleagues and Suppliers,

While gift giving is well-intentioned, *“No personal gifts should be offered or received under circumstances that would raise a reasonable question concerning whether a gift was offered or received improperly to influence a person in the exercise of proper business judgment.”*

We ask that our business colleagues and suppliers never offer entertainment gifts, gift cards, or tickets to events such as theater, sporting events, concerts, fishing trips or the like. In addition, and to reduce any concern or perception of impropriety, we ask our business partners to refrain from offering any gifts to Draper employees.

Draper is committed to ethical business conduct, and we expect the highest standards of ethical behavior in all parts of our business and from each of our employees. Our Core Values guide how we treat our customers, partners, community, and coworkers. To maintain a standard of excellence in all aspects of our work, Draper employees and representatives have an obligation to act ethically and to report any known or suspected violations. As such, we would expect you would report to us any unethical or illegal activity by our employees or representatives.

If you have any questions or information concerning Draper’s Ethics & Compliance policy, we invite you to reach out directly to Draper Ethics and Compliance Department at [ethicsquestions@draper.com](mailto:ethicsquestions@draper.com). Or should you prefer to remain anonymous, you can go to [www.lighthouse-services.com/draper](http://www.lighthouse-services.com/draper) or call 800-420-0003.

Sincerely,

Linda M. Connell  
Vice President, Supply Chain  
The Charles Stark Draper Laboratory, Inc. (Draper)