



SMALL BUSINESS SUBCONTRACTING POLICY STATEMENT

Sterling Computers Corporation (“Sterling”) understands the maximum practicable utilization of small businesses as subcontractors in U.S. Federal Government contracts is a matter of national interest with both social and economic benefits. As an information technology (IT) Value-Added Reseller (VAR), we recognize that purchasing products and services from qualified small businesses is one of the ways we can support small businesses in the local community and surrounding areas where we live and work. We believe supporting these small businesses results in continuous improvement of our supply chain, the growth of our markets, and the overall success of our customers, suppliers, and communities. This effort makes our company stronger and demonstrates our corporate social responsibility and small business excellence. Further, the U.S. Federal Government depends on small businesses to round out its supply chain and to facilitate achievement of important procurement goals. As the focus of government spending shifts more and more towards innovation and meeting agencies’ burgeoning technology needs, small businesses are providing the Government with information technology more than ever before. Thus, small businesses are critically important to federal government procurement. To that end, we will provide maximum practicable opportunities for small businesses able to offer quality, cost-effective, competitive products and services. This Small Business Subcontracting Policy Statement affirms Sterling’s commitment to the principles of small business utilization for performance of Federal Government contracts. As employees of Sterling, I encourage and ask each of you to conduct yourselves in a manner which furthers those principles, to support Sterling’s small business subcontracting initiatives, and to make a good faith effort to comply with small business subcontracting plans.

SMALL BUSINESS SUBCONTRACTING POLICY

Sterling is committed to ensuring qualified small businesses have the maximum practicable opportunity to participate in U.S. Federal Government contract performance. This commitment applies to a variety of socioeconomic small businesses, including small disadvantaged businesses, woman-owned small businesses, veteran-owned small businesses, service-disabled small businesses, HUBZone small businesses, and 8(a) small businesses. At Sterling, we will make maximum practicable utilization of small businesses as Sterling subcontractors. We will make subcontracting decisions in compliance with applicable law related to small business utilization and small business subcontracting plans and consistent with efficient contract performance. This includes establishing procedures to ensure the timely payment of amounts due pursuant to the terms of our subcontracts with small businesses.

SMALL BUSINESS SUBCONTRACTING PROGRAM

Sterling is committed to ensuring its Small Business Subcontracting Policy is implemented and complied with, both in letter and spirit, which we do through our Small Business Subcontracting Program. Our Small Business Subcontracting Program includes developing our policy statements, goals for small business utilization, training and awareness programs, and outreach efforts. It also includes establishing procedures to ensure the timely payment of amounts due pursuant to the terms of our subcontracts with small businesses. It continues to be important for all of us at Sterling to support our Small Business Subcontracting Program and to work together to promote and further the principles of small business utilization and small business subcontracting plans. Overall responsibility of Sterling’s Small Business Subcontracting program is assigned to the Small Business Liaison Officer (SBLO).

APPROVAL AND SIGNATURE

Sterling’s Small Business Subcontracting Program is endorsed by top management. I sign this Small Business Subcontracting Policy Statement to affirm Sterling’s commitment to, and my personal and professional support of, the principles of small business utilization for performance of Federal Government contracts in compliance with applicable law and consistent with efficient contract performance.

Sincerely,

Brad Moore, CEO

March 1, 2024