

ARCFIELD™



CODE OF CONDUCT

2023

LGL-001.01 REV 2



MESSAGE FROM THE CHAIRMAN AND CHIEF EXECUTIVE OFFICER

I am pleased to provide you with the Arcfield code of conduct. This code provides guiding principles in our effort to meet our mission and outlines the concrete behaviors that are expected from every employee to uphold our values.

Following the company core principles means striving to be the best in everything we do and helps bring integrity to how we deliver for the mission, our colleagues and the business. Our guiding principles are meant to be more than just words on a page—they're a call to action that guide everything we do.

As this code makes clear, each of us is expected to be a steward of the highest ethical standards. Yet demonstration of ethical behavior on an organizational scale is neither accidental nor unintentional. Ethical behavior is deliberate and purposeful, and requires a certain level of selflessness that respects others while building strong interpersonal relationships.

If we each adopt the guidelines presented on the following pages, we will build a unified culture that will not only define who we are as a company but propel Arcfield ahead of its competitors. But most importantly, acting ethically will allow us to deliver the highest value to the mission, our colleagues and the business.

Core Values

Advance the mission

Empower our people


Support the business

Respect for self and others

Hold each other accountable

Mission

To provide unparalleled services in systems engineering and integration, digital transformation, and C5ISR solutions supporting the security and protection of our nation, our military forces, and our allied partners against near-peer and emerging adversaries.



Ethics is knowing
the difference
between what you
have a right to do and
what is right to do.

Former U.S. Supreme Court Justice Potter Stewart

MESSAGE FROM THE ETHICS AND COMPLIANCE OFFICE

Our core values drive our behavior every day—whether we're 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. This means understanding our compliance policies and procedures and raising concerns when necessary.

Ethics issues and concerns can be reported in a variety of ways, including anonymously through our ethics helpline. All concerns raised will be treated confidentially and we will never retaliate against any employee who speaks up honestly and in good faith. We expect our employees to behave with integrity, and will hold them accountable if we find misconduct.

Our code of conduct as well as supporting policies, guidance documents and related training, provide the framework for employees to meet the company's expectations in performing work for the company. If you find yourself in a situation where you do not know what to do, reach out for guidance. Your leadership, the office of general counsel, human resources, security, and the ethics and compliance team are available to provide answers.

As employees, we are all responsible for understanding and complying with the code, applicable laws, government regulations and company policies related to our jobs. In fulfilling these responsibilities, each of us must:

- Read, understand, and comply with the code and company policies related to our job
- Participate in training and educational programs/events required for our job
- Obtain guidance for resolving a business practice or compliance concern if we are uncertain about how to proceed in a certain situation
- Report possible violations of the code, policies, applicable laws and regulatory requirements through one of our established channels
- Cooperate fully in any investigation
- Make a commitment to conduct company business with integrity and in compliance with applicable laws and regulatory requirements

UPHOLDING THE CODE OF CONDUCT

Our code of conduct provides ethical guidelines and expectations for conducting business. All employees and members of the board of directors, as well as consultants or others representing the company, are expected to act in ways consistent with the code. You are required to read the code of conduct, raise questions if you have any concerns or if you need clarification, and conduct business in accordance with the code of conduct. The ethics and compliance office (ECO) serves as an independent resource for information, advice and resolution of problems and issues.

Headline test

The headline test is a simple way to check if your decision is ethical and meets company expectations:

- Is it legal?
- Is it consistent with the code and company policies?
- Would others think it was ok if they read it in a news story?

If your answer is no to any of these questions, do not do it. If you are unsure, seek guidance.

When in doubt: Ask before you act!

"See something, say something"

We all have the responsibility to promptly report a violation if we believe that a violation of the code has occurred or if we are asked to violate the code.

You are encouraged to raise issues to your manager. If you are uncomfortable with the answer, seek guidance from:

- Another manager
- ECO or the Chief Legal Officer
- Human resources
- Security
- Ethics helpline at (855-222-4894) or <https://www.lighthouse-services.com/arcfield>

Speaking up to report questionable conduct protects the ethical work culture we value as employees and it protects our company. It is never acceptable to violate the code of conduct for an employee's personal benefit, for the benefit of the company, a third party or customer.

Concerns may be raised anonymously through the ethics helpline or Syntrio Lighthouse Hotline website.

Our actions matter

Part of being a leader at the company means promoting an inclusive, positive, ethical work environment where all employees are valued for their contributions. Leaders are responsible to encourage employees to speak up and raise issues or concerns. Modeling ethical behavior or "walking the walk" is crucial to maintaining an ethical culture we can all be proud of.

WE COMPLY WITH LAWS AND REGULATIONS

As employees with integrity, we are expected to perform all of our job duties on behalf of the company in compliance with the laws and regulations of the United States (including states and municipalities) and company policies. The Legal Department and the ECO are always available to help you understand the laws and regulations that apply to your job. It should be understood, however, that upholding our values and the code may require more than mere compliance with laws and regulations.

Our president and senior financial officers have a special duty to ensure that our financial statements accurately represent our financial position. We must:

- Never ignore or overlook financial misconduct or other irregularities
- Always cooperate with auditors and investigators
- Promptly disclose any potential conflict of interest
- Honor, safeguard and promote compliance with our internal control systems
- Ensure our books and records are maintained in accordance with applicable accounting standards

WE MAINTAIN ACCURATE BUSINESS RECORDS

You must ensure the accuracy of all business or financial records for which you are responsible, and maintain records in accordance with your department's policy.

If you have concerns about any aspect of our business, financial records or auditing matters you should talk to your manager, finance, legal or the ECO.

WE ACCURATELY RECORD AND CHARGE LABOR AND OTHER COSTS

You and your manager are responsible for understanding and complying with the labor recording policies and procedures specific to your work. You are also responsible for properly accounting for labor, travel, material and other costs, as well as ensuring that they are accurately recorded and charged to appropriate cost objectives, and if necessary, company corporate credit cards. These costs include, but are not limited to, normal contract work, indirect work, work related to independent research and development, and bid and proposal activities.

Knowingly mischarging the time that you work or falsifying your time keeping violates company policy and the law.

No employee shall knowingly charge an incorrect account or cost objective, or knowingly approve such mischarging. Shifting costs to improper accounts is also prohibited.

Transactions between the company and outside individuals and organizations must be promptly and accurately recorded. Under no circumstances may you misrepresent facts or falsify records.

The company does not tolerate mischarging of time or expenses, even if inadvertent. Employees who mischarge their time or expense violate the company's code of conduct and are subject to disciplinary action. The company will comply with customer reporting obligations related to mischarging of time and

expenses. Additionally, the employee's manager will be held accountable for approving mischarged time and may be subject to disciplinary action.

Disciplinary action will be taken against any employee, supervisor or manager who retaliates against an employee who reports a mischarging violation, or who may be responsible for a violation due to inadequate supervision.

On the basis of adequate evidence, and considering the seriousness of the acts or omissions, disciplinary action may range from a written reprimand in the employee's file to termination of employment. Civil or criminal prosecution by the US government is also possible.

WE DO NOT DISCLOSE NONPUBLIC MATERIAL INFORMATION

In your work, you may have access to information about our company or third party that is not available to the public. Nonpublic information requires protection by every employee. Nonpublic information can include:

- Mergers and acquisitions
- Changes in leadership
- Financial projections
- Significant business deals

Never share nonpublic information until it has been released to the public. Be careful to avoid even the appearance of an improper disclosure or transaction based on nonpublic information. If you're ever unsure whether information has been released to the public or if you can share it, seek guidance from legal or the ECO before taking action.

WE COMPETE VIGOROUSLY AND FAIRLY

The company will not use a substantial market position to establish restrictive practices that diminish competition without valid business justification or consumer benefits and always in compliance with antitrust and competition law. We do not agree with competitors or partners to any type of bid rigging or improper collusion; this includes but is not limited to, setting prices, limiting production, or dividing up customers, suppliers or markets. In addition, the company's governance processes and business reviews ensure that partnering and teaming decisions are based on meeting customer requirements, work share demands and providing complementary skills to the activity. Similarly, company labor and human resources policies forbid using hiring practices (e.g., overly broad or improper restrictive covenants) to impede competition or to improperly increase market share.

You must avoid engaging in or discussing any of the above activities with competitors, suppliers or customers, and must report any instances in which such activities are proposed or discussed to legal.

WE RESPOND TRUTHFULLY AND ACCURATELY TO AUDITS, INVESTIGATIONS AND LEGAL ACTIONS

You are required to cooperate with all internal investigations and audits. You must never destroy or alter any documents or electronic records; lie to or mislead an investigator; or obstruct the

collection of information relating to an investigation, litigation or audit.

Occasionally, as part of an investigation, legal, the ECO, human resources, or security may conduct an inspection or surveillance of company property. The reasons for such investigations include protecting the company, its employees, and customers against fraud and espionage, and preventing the abuse of company property and other business purposes. Employee records, documents, telecommunications, voicemail, email, internet and computer systems, as well as company premises, mail, offices, furniture, equipment, employee offices, desks, file cabinets, computer files, telephone toll records and lockers, are subject to inspection. Additionally, all packages and employee automobiles, while on company premises, are subject to inspection without prior notice.

To the greatest extent possible, the company cooperates with government agencies responsible for investigating suspected violations of the law.

WE COMPLY WITH LAWS AND REGULATIONS GOVERNING POLITICAL CONTRIBUTIONS AND LOBBYING

Many countries, including the United States, prohibit the company from donating corporate funds, goods or services—including employee work time—directly or indirectly, to political candidates. Local and state laws also govern the company's political contributions and activities. Because the laws in this area are complex, you must obtain written approval of legal before using any company funds, assets or facilities for the benefit of political parties or candidates anywhere in the world.

You are encouraged to participate personally in civic affairs and the political process and to support the political parties and candidates of your choice. Your involvement and participation in the political process must be on an individual basis, on your own time, at your own expense and not as a representative of the company. If you are directly solicited to contribute to a political campaign or attend an event on behalf of the company, you must contact legal and corporate communications prior to the event.

If you campaign for or hold public office, or serve on commissions or advisory groups, you must be aware of and avoid conflicts of interest that may arise related to your employment with the company. If you plan to seek or accept a public office, you must consult with legal in advance to resolve any potential conflicts of interest.

You must also be certain to know and follow company guidance before contacting U.S. congressional and executive branch employees and staff.

If you engage in such activity, you may be engaged in lobbying. You must coordinate with legal before interacting on behalf of the company with U.S. congressional and executive branch employees and staff.

WE DO BUSINESS ETHICALLY OUTSIDE THE UNITED STATES

The company is committed to the highest standards of ethical

conduct applies globally. Unless prohibited by U.S. law, you are responsible for complying with the national and local laws of the countries in which we operate. In the case of a conflict with U.S. law, you must obtain direction from legal or the ECO on how to resolve the conflict.

Anti-corruption

You must strictly comply with the anti-corruption laws that govern our operations in the countries in which we do business. Such laws include the U.S. Foreign Corrupt Practices Act (FCPA) and similar laws enacted by other countries. Generally, these laws prohibit bribery, directly or indirectly, of foreign government officials, political parties or candidates to obtain some improper business advantage. More specifically, they prohibit you, directly and indirectly, from corruptly giving, offering, or promising anything of value to foreign officials or foreign political parties, officials or candidates, for the purpose of influencing them to misuse their official capacity to obtain, keep or direct business or to gain an improper advantage. In addition, to prevent concealment of bribery, the FCPA prohibits knowingly falsifying a company's books and records, or knowingly circumventing or failing to implement adequate internal accounting controls.

Export/import and other trade restrictions

You are required to strictly comply with all export and import laws and regulations that govern the transfer between countries of certain technical data, equipment and technology. The export licensing and controls that govern such transfers, as well as the rules pertaining to the import of goods and services, are complex. You must be careful to avoid even inadvertent violations.

In addition, you may not obligate the company to engage in trade in any country subject to trade restrictions imposed by the U.S. government. Such restrictions can include sanctions or embargoes that prohibit the company from engaging in certain business activities in specified countries, and with specified individuals and entities. To ensure compliance, you are responsible for consulting with company experts in the International Trade Compliance Office (ITCO) before negotiating any international transaction.

Anti-boycott

You may not enter into an agreement, provide any information, or take any action that would cause the company to deal with potential or actual customers, suppliers or others in support of an illegal boycott, or otherwise engage in or support restrictive international trade practices or boycotts not sanctioned by the U.S. government. All requests to engage in any such activity must be immediately reported to legal or the ECO.

Anti-money laundering

Employees are prohibited from participating in any money laundering transaction which can include steps such as placement, layering and integration. Illegitimate funds cannot be introduced into the legitimate financial system to achieve integration with and into a financial system through additional transactions. Money laundering can facilitate crimes such as drug trafficking and terrorism, and can adversely impact the global

economy and the company, and our employees are required to comply with regulations prohibiting such transactions.

Combatting human trafficking

Employees are prohibited from participating in any human trafficking-related activities, including but not limited to engaging in severe forms of trafficking, procuring commercial sex acts, using forced labor and other forms as identified in FAR 52.222-50. Violations of the prohibition will result in actions that will be taken against employees which may include, but are not limited to removal from contract(s), reduction in benefits, or termination of employment. Employees are encouraged to report, without fear of retaliation, activity inconsistent with the policy prohibiting trafficking in persons by contacting the ECO or legal department or contacting the Global Human Trafficking Hotline at 1-844-888-FREE and its email address at help@befree.org.

WE HAVE ZERO TOLERANCE FOR DISCRIMINATION AND HARASSMENT

The company values inclusion and diversity in the workplace. Understanding and respecting each individual brings out the best in all employees so we can achieve great things together.

DIVERSITY AND TEAMWORK

The company's success is predicated on our ability to attract and retain the highest-quality people with a range of viewpoints to help solve our customers' most pressing problems. To do that, each of us must be dedicated to maintaining and reinforcing an open and supportive work environment that fosters professional development and achievement.

The company is a premier partner of choice for providing high-impact analytical and technical expertise to solve our customers' complex problems. We foster a workforce culture that recognizes diversity as a business imperative and leverages inclusion to drive performance, promote business growth, and enhance mission success and customer satisfaction.

We attract, develop and retain talent from diverse backgrounds, and ensure that employees and candidates for employment are afforded equal opportunity in all employment actions. By creating a culture committed to our core values, we leverage the unique make-up of our professionals to solve complex issues. Every employee must foster an inclusive workplace in which all individuals can contribute their best work.

WE PROVIDE A HARASSMENT-FREE WORK ENVIRONMENT

The company is committed to providing a respectful work environment that is free from threats, violence, harassment and discrimination. You are expected to maintain a professional work environment and treat all employees, suppliers and customers with dignity and respect.

No employee shall engage in any conduct of a threatening, hostile, offensive, abusive, humiliating, or violent nature toward any employee, supplier, customer or any other person with whom he or she comes into contact during or as a result of his or her employment with the company. The company does not tolerate

inappropriate actions, comments, physical contact, bullying, sexual advances or any other conduct that is intimidating or otherwise offensive or hostile.

Harassment or discrimination of any kind—including on the basis of sex, race, color, ethnicity, pregnancy status, religion, age, disability, national origin, sexual orientation, veteran status, genetic information, ancestry, gender identity or expression, marital status, political affiliation or any other legally-protected characteristic—will not be tolerated.

If you have any knowledge of violence or the threat of violence, intimidation, harassment, or discrimination, it is your responsibility to report it to your manager, security, human resources, legal or the ECO immediately.

Discrimination or harassment in the workplace by any employee is taken extremely seriously and can result in disciplinary action up to and including dismissal as well as personal legal and financial liability.

WE PROVIDE AND ACCEPT APPROPRIATE AMENITIES

The company defines the term “business amenity” broadly to mean a gift, gratuity, favor, benefit, loan, commission, discount, forbearance or other intangible or tangible item having monetary value for which fair market value is not paid by the recipient. Such courtesies include, but are not limited to cash, honoraria, entertainment and recreation (tickets to sporting, recreational, or other events, passes, fees, etc.), services, training, transportation, discounts, promotional items, lodging, meals, drinks, door prizes, or use of a donor’s time, material, equipment or facilities.

The company does not consider the following items to be amenities:

- Modest refreshments, such as water, tea, coffee and snacks (other than meals)
- Greeting cards, plaques, certificates, etc. intended for presentation
- Benefits (e.g., discounts) that are also available to the public or to all government employees
- Anything for which the recipient pays fair market value

WE DO NOT OFFER OR PROVIDE BUSINESS AMENITIES TO GOVERNMENT CUSTOMERS

The rules and regulations that apply to the offering of business courtesies to government employees, officials and representatives of the U.S. federal, state and local or foreign governments are complex. In this marketplace, even the appearance of impropriety can be the basis for protests, governmental inquiries, or the loss of the company’s ability to conduct government business. **It is company policy that employees may not offer, give or promise to give, directly or indirectly, any government employee anything of value—including gifts, meals, entertainment or travel—unless the recipient pays its fair market value.** Other government contractors often have similar restrictions concerning the acceptance of business amenities by their personnel which should be respected in our dealings with them.

Limited exceptions may apply only when approved, in advance, by the ECO and your manager. Only very limited exceptions will be considered for approval, such as openly announced marketing activities, appropriate no-charge service offerings, select promotional activities and public policy initiatives.

In all cases, even if one of the limited exceptions applies, employees may not offer, give, solicit or receive any amenity or other thing of value in exchange for favorable treatment or advantage, or for the purpose of obtaining, or attempting to influence the award of a contract or subcontract.

PERSONAL GIFTS TO FRIENDS AND FAMILY

Company gifts to friends and family who happen to work for a government entity are not prohibited as long as:

- The gift is given under circumstances which make it clear that the gift is motivated by a family or personal relationship and that the relationship is not rooted in business activities with the company
- Company funding is not, in any way, used to pay for a personal gift provided within these guidelines

OFFERING OR PROVIDING BUSINESS AMENITIES TO NON-GOVERNMENT CUSTOMERS AND PARTNERS

You may provide business amenities of reasonable value to non-government customers in support of company business activities, provided:

- The practice is not for any improper purpose and does not violate any law or regulation or, to your knowledge after reasonable inquiry, the standards of conduct of the recipient’s organization
- The business amenity is consistent with marketplace practices, infrequent in nature and not lavish or extravagant and in no way is charged to a customer

You are prohibited from offering or giving tangible gifts (including tickets to sporting, recreational or other events) having a market value of \$50.00 or more to a person or entity with which the company does or seeks to do business, unless specifically approved, in advance, by the ECO and your manager.

ACCEPTANCE OF BUSINESS AMENITIES BY EMPLOYEES WHO PROCURE GOODS OR SERVICES

If you buy goods or services for the company or are involved in the procurement process, you must treat all suppliers uniformly and fairly. In deciding among competing suppliers, you must objectively and impartially weigh all facts and avoid even the appearance of favoritism. For this reason, you may not accept gifts from suppliers or vendors, except advertising or promotional items of nominal value such as a pen, key chain, water bottle, visor, cup or glass or generally similar items displaying a company’s logo. Established routines and procedures should be followed in the procurement of all goods and services.

ACCEPTANCE OF BUSINESS AMENITIES BY EMPLOYEES IN NON-PROCUREMENT FUNCTIONS

Although you may not use your position at the company to obtain business amenities, it is permissible to accept unsolicited business

courtesies, provided the acceptance:

- Will promote goodwill and successful business relations
- Is not lavish or extravagant under the circumstances
- Is not frequent and does not reflect a pattern or the appearance of a pattern of frequent acceptance of amenities from the same entities or persons
- Has a market value of \$50.00 or less
- Is something you would feel comfortable discussing with your manager or a coworker, or having known by the public

Any exceptions must be approved by the chief legal officer. Solicitation of business amenities is always prohibited. It is your personal responsibility to ensure that your acceptance of a business amenity does not create the perception that favors were granted to secure favorable treatment.

Questions and exemptions

If you have any questions about whether an offer or acceptance of a business courtesy is in compliance with applicable laws, regulations, and company policies, you must obtain guidance in advance from the ECO. You may only offer, give or accept a business amenity that is not expressly permitted by the code of conduct or company policies if you obtain written approval, in advance, from the ECO and your manager.

WE AVOID PERSONAL CONFLICTS OF INTEREST

A personal conflict of interest exists when you have divided loyalties—when you have a direct or indirect personal interest in a transaction or matter such that it might reasonably appear to affect the judgment that you exercise on behalf of the company, influence your actions or lead you to neglect the company's business interests.

Employees have the responsibility to act in a fair and impartial manner in all business dealings, and to place the interests of the company over personal interests in matters relating to company business.

Government contracting employees "who perform an acquisition function closely associated with inherently governmental functions or have access to nonpublic information" need to be particularly free from any personal conflict of interest.

PERSONAL CONFLICT OF INTEREST GUIDELINES

You must avoid financial, business or other transactions or situations in which your personal interests might conflict with, or appear to conflict with, the interests of the company. Such situations may arise from relationships with customers, competitors, suppliers, present or prospective employees or from the acquisition or use of company assets for personal gain. An actual personal conflict of interest does not need to be present to constitute a violation of the code; you must also avoid activities that create the appearance of a conflict of interest.

A personal conflict of interest may exist when you use your contacts or position in the company to advance interests other than the company's, such as your own private business or financial affairs, or those of a friend or relative (whether or not at

the expense of the company). You should never use company property or information for personal gain, or take for yourself personally any opportunity that is discovered through your position at the company.

Examples of how a personal conflict of interest could occur:

- Acceptance of gifts, payment or services from those seeking to do business with the company
- Having a personal interest or potential for gain in any company transaction
- Placement of business with a firm owned or controlled by an employee or their family
- Ownership of, or substantial interest in, a company that is a customer, competitor or supplier
- Employment by a competitor or potential competitor, regardless of the nature of the employment, while employed by the company
- Acting independently as a consultant to a company customer or supplier, while employed by the company
- Having a close, personal relationship with a subordinate employee or customer employee

You must disclose in writing any situation, transaction, or relationship that might give rise to an actual or potential conflict of interest to your manager, who will review the disclosure with the ECO.

WE AVOID ORGANIZATIONAL CONFLICTS OF INTEREST

To ensure that the company is free from or properly mitigates organizational conflict of interest (OCI) issues, all new business opportunities are screened by business development and contracts personnel. If during the screening process a potential OCI is identified, company leadership and contracts will meet to determine what course of action will be pursued.

Proactive screening and resolution of OCI issues ensures our continued participation in new business opportunities, while supporting our policy to conduct business in accordance with the highest standards of ethics and integrity.

WE AVOID CONFLICTS OF INTEREST WHEN HIRING AND WORKING WITH FORMER GOVERNMENT EMPLOYEES

The company is proud that many of its employees are former government employees or members of the armed forces, and values the expertise and skills these individuals bring to the company. In recruiting current and former government employees, the company is cognizant that certain laws and regulations may restrict the activities these individuals can perform after leaving government service.

Current and former government employees must undergo screening to identify any post-employment restrictions which might impede an applicant's ability to perform work for the company. In addition, current government employees applying for a position with the company must affirm that they are in compliance with their ethical obligations in seeking outside employment.

You are responsible for ensuring the company avoids conflicts of

interest in connection with employing or acquiring the services of current or former government employees. The laws and regulations governing the hiring and employment of former government employees can be difficult to follow. When in doubt, you should consult company policies and procedures, and seek the advice of your manager, human resources, the ECO or legal.

WE PROPERLY ENGAGE CONSULTANTS, REPRESENTATIVES AND OTHER THIRD PARTIES

You must not retain a consultant, representative or other third party to conduct business in a manner that is contrary to company policies and procedures, or that would circumvent our values and principles. For example, you must not retain consultants, representatives or other third parties for the purpose of paying bribes or kickbacks, engaging in industrial espionage, obtaining the proprietary data of a third party without authority, or improperly gaining insider information or influence. You are responsible for seeking advice from legal prior to engaging an international or domestic consultant. Consultants and representatives must certify their willingness to comply with the code, company policies and procedures, and all applicable laws and regulations.

WE GUARD INFORMATION

We protect sensitive information

The company's customers trust us with their sensitive information, and it is our obligation and requirement to protect it fully and completely. You may not disclose or receive sensitive information, including proprietary company information, without proper authorization. You must keep sensitive information, including any proprietary documents, protected and secure. You may only disclose sensitive information if you have the proper authorization to do so.

You should not include any proprietary or confidential information in any public disclosures without obtaining the proper prior approval. Public disclosures include publications, presentations, reports or documents filed with regulatory authorities, and other public communications.

In the course of normal business activities, suppliers, customers and competitors may sometimes divulge to you information that is proprietary to their business. You may only accept or use the proprietary information of a supplier, customer, or competitor in accordance with the terms of your agreement with that third party and company policy. If you receive proprietary information from a supplier, customer, or competitor without proper authorization, you must immediately bring this to the attention of legal or the ECO.

If you become aware of any unauthorized use of company or customer information in violation of these guidelines, you must immediately bring this to the attention of legal or the ECO. You must also report any suspicious computer activity.

We protect personal information

In the course of performing work for the company, you may be

required to access the personal information of other employees or third parties. If you collect or access personal information on behalf of the company, you are responsible for knowing and complying with all applicable laws and policies that govern such activities.

You must not access personal information of another company employee or third party unless you have a "need to know" such information for legitimate business purposes and have prior authorization. If you have access to personal information, including personal or medical records, you may not disclose such information without proper authorization.

You must keep personal information protected and secure in accordance with all corporate policies, laws, and applicable third party agreements. You must never use personal information for any purpose for which it was not intended or for personal gain.

If you become aware or believe that personal information has been accessed by an unauthorized person, disclosed inappropriately, used for purposes other than company business, or gathered in violation of corporate policy or the law, you must immediately bring this to the attention of legal or the ECO.

We protect company and customer assets

You are responsible for the proper use of company and customer property, electronic communication systems, information resources, materials, facilities and equipment. You must use and maintain these assets with the utmost care and respect, guarding against waste and abuse, and you must never borrow or remove them from company or customer property without management's permission.

Company assets are intended to be used for the conduct of company business. You may occasionally use company assets for personal use if you obtain permission from your manager and your use is in accordance with company policy. You must also seek guidance and permission before using any customer assets for personal use. You may not use the company's resources to support a personal business, or for an illegal act or a purpose which would cause embarrassment to the company. Use of corporate credit cards for personal use is strictly prohibited.

You have no expectation of privacy with regard to use of company assets. By your acknowledgement of the System Use Monitoring Notice upon logging in to your computer, your usage may be monitored and recorded.

When electing to access corporate data remotely through the Bring Your Own Device (BYOD) program, you must comply with the user acknowledgement agreement including the rules of behavior. The company has the right to restrict or rescind computing privileges, or take other administrative or legal action due to violation of these rules.

When using social media for business or personal use, you must be aware of, understand and embrace company standards and values, including respecting others, behaving appropriately, using sound judgment and prohibiting the unauthorized use of the information of others.

While on company premises, you may not use electronic devices while driving unless the vehicle is parked in a safe and legal location or, for voice communications only, unless a hands-free device is used.

WE STAY FOCUSED ON SECURITY

Our commitment to security is at the core of who we are as a company. More importantly, sound security practices protect our nation's future and the lives of personnel serving in harm's way defending our freedoms. We are accountable to protect security information in order to maintain our clearances and company proprietary information as a condition of employment. You are our first line of defense when it comes to security. Take the time to learn and apply good security practices and help others when you notice they need your help in doing the same.

Facility security

Company identification (ID) badges are company property. Your ID badge must be worn and visible at all times while on company premises. Employees should challenge any person not wearing a company ID badge. Report the loss or theft of your ID badge immediately to your manager and security.

You are responsible for following security protocols at your location, including badging in and out of a building as required. Smartphones (or cell phones) and other electronic devices are not permitted in sensitive compartmented information facility (SCIF) areas.

Employees have the responsibility for ensuring that any visitor to a company site is properly logged in and badged at the applicable reception area. Employees are also responsible for escorting visitors at all times within company buildings.

WE REPORT ADVERSE INFORMATION

Possession of a security clearance is a privilege, not a right. Under the National Industrial Security Program Operating Manual (NISPO), the company is required to report any adverse information concerning any cleared employee. Adverse information is any information that reflects negatively on the integrity or character of a cleared employee or suggests that his or her ability to safeguard classified information may be impaired. This can include, but is not limited to, information regarding criminal behavior or misconduct, substance abuse, excessive foreign contacts, financial difficulties and mental or emotional disorders that can create security risks.

It is the responsibility of every employee to report any adverse information related to a cleared employee to the security organization. Reports based on rumor or innuendo should not be made. Adverse reporting procedures are provided in the NISPO, Section 3. Please contact your program security representative or facility security officer for any questions about this obligation and the process for adverse information reporting.

WE REPORT INSIDER THREAT INFORMATION

The company is proud of its legacy and longstanding relationship with the intelligence and defense communities. As such, we are

firmly committed to the protection of national security information, systems and assets as well as our intellectual property, proprietary data and personally identifiable information (PII). The company's insider threat program combines federal government and company requirements into a single-focused program designed to detect and mitigate actions by employees or individuals who may represent a threat to protected information and assets.

The company's program is built on continuous and aggressive assessments, evaluations, and monitoring of our digital and physical environments. Critical to this approach and the unique nature of insider threats. The company recognizes that a successful program requires an unyielding commitment from its executive leadership and active participation at all levels.

Management commitment and employee participation are reinforced through our security education and training program, which heightens awareness and emphasizes adherence to policies regarding reportable events. It is the responsibility of all employees to help protect our company and our information, and that when anyone sees something that is not in accordance to our core values, our ethics or our commitments to ourselves and our government customers we all need to say something.

WE MAINTAIN A SAFE AND HEALTHY WORK ENVIRONMENT

The company is committed to providing a safe, healthy and productive work environment. You are responsible for complying with all applicable environmental, security and health and safety laws and regulations. This means observing all posted warnings and regulations and promptly reporting any accidents, injuries, unsafe work conditions and all situations that may pose an environmental, health or safety hazard to the appropriate management representative.

No task is ever so important that it needs to be performed in an unsafe manner, nor should any employee be required to travel to work in a location he or she believes to be unsafe.

Alcohol, drug and smoke-free workplace

The company is committed to providing a drug- and alcohol-free work environment. You may not be under the influence of alcohol or illegal drugs or abuse legal drugs in the workplace at any time. You are expected to be fit for work and capable of performing your assigned responsibilities in a safe and productive manner.

Please note that consumption of alcohol for legal aged employees may be authorized at Arcfield-sponsored or approved work-related functions either onsite or offsite in accordance with HR-003.

The company also maintains a tobacco- and smoke free environment. You may not smoke or sell tobacco products on company premises except in designated areas.

Solicitation and postings

Commercial solicitation or distribution on company premises on behalf of non-company business enterprises is prohibited at all times. Employees may not engage in verbal solicitations or

engage in the distribution of materials interfering with work during working time, other than for company business purposes ("working time" does not include time before or after work, or during breaks or lunch periods).

Employees may not use company assets or resources for solicitations or distribution of materials, other than for company business purposes. It is company policy to communicate items of general interest to its employees through the issuance of memoranda and notices through company websites. No posters, charts, notices or other display material shall be posted anywhere on company property except when authorized by human resources or facilities.

Environmental controls

No employee may use hazardous chemicals at a company facility without a documented work need, appropriate training and prior manager approval consistent with such work need. Every employee authorized to use hazardous chemicals shall acquire, use and dispose of them only in accordance with applicable environmental protection laws.

MAKE THE RIGHT CHOICE QUIZ

Striving to be the best in everything we do means we each have a responsibility to help shape our culture through our personal commitment to meet the highest ethical standards in all we do. Codes and policies alone cannot create a company-wide ethical culture where we all value each other and do business with the highest level of integrity.

If you are faced with a difficult decision, ask yourself the following questions:

- Is it the right thing to do?
- Will my actions be consistent with the company's code of conduct and the law?
- Am I aware of all the relevant facts, and have I considered all options?
- Will I feel proud and comfortable telling others about the choice I made?
- What will my family and friends think of me?
- What impact will my action have on my customer, suppliers and other employees?
- Will my action result in an embarrassment to myself?
- What impact will my action have on me?

If you are still unsure of what to do, continue to seek guidance. Do not hesitate to reach out to the various resources available to you until you have the information you need to make the right choice.

Employees of foreign-owned subsidiaries of Arcfield (e.g., Arcfield Canada) are obligated to be versed on standards and policies discussed herein. Additionally, such employees are reminded to seek legal or compliance guidance on topics that are determined or governed by country-specific laws and regulations.

ABOUT THE ETHICS AND COMPLIANCE OFFICE

We want to uphold the highest standards of integrity, and we want to do more than comply with laws and regulations.

The company's ECO affirms and emphasizes our commitment to ethical conduct. The company's ethics and compliance office reports directly to the chief legal officer, may periodically provide reports to the company Board of Directors and oversees a vigorous company-wide program to promote a positive, inclusive and ethical work environment for all employees. The ECO maintains the confidential company ethics helpline and is also responsible for conducting investigations into alleged violations of the code of conduct or other company policies.

You are encouraged to reach out to the ECO team whenever you have a question or concern that cannot be readily addressed within your work group or through your manager.

If your concern relates to the actions or decisions of the ECO, please contact the company's chief legal officer.



How to Contact the ECO

Contact the ethics helpline at 855-222-4894

This helpline, maintained by Syntrio Lighthouse Hotline, is available 24/7/365. You can also file a report online at:

<https://www.lighthouse-services.com/arcfield>
ethics@arcfield.com

Arcfield

14295 Park Meadow Drive
Chantilly, VA 20151

Anonymous reports may be made through the Syntrio helpline (855-222-4894) or Syntrio Lighthouse Hotline website.