



system | one

CODE OF BUSINESS CONDUCT

cimplifi™
a System One division

JOULÉ®
a System One division


MOUNTAIN, LTD.
a System One division


NTPWIRELESS®
a System One division


cm access
a System One division

BUILDING DYNAMIC MEDIA TEAMS
teampeople
a System One division

Message From Our Executive Team

Through bold vision and disciplined focus for more than 40 years, System One has become a top integrated services and workforce solutions firm in the United States. We now have more than 8,000 employees and consultants working from more than 50 offices and thousands of client locations across the United States and Canada. Our client delivery spans numerous industries, including critical infrastructure, technology, life sciences, and government. Many of our clients are industry leaders who look to us to deliver the most critical solutions for their core operations and business challenges. We leverage our deep industry expertise, allowing for the delivery of differentiated and highly-customized solutions.

Our success has depended on remaining committed to fundamental values, such as honesty, lawful conduct, full accountability, compliance, fair competition, and always striving to just “do the right thing.” This Code of Business Conduct is intended to keep guiding us to abide by our fundamental values.

This Code also illustrates how, individually and as an organization, we are expected to uphold and foster System One’s values among ourselves and when we engage with clients, investors, business partners, contractors and the public at large.

We expect you to read, understand, and comply with the Code, and we strongly encourage you to report any violations of the Code, the law, or any Company policy. The Code is intended to help guide you in your day-to-day interactions. There may be times, however, that you may need more detailed information about a particular topic. In that case, you are encouraged and expected to review the Company’s employee handbook, which, in many cases, contain the Company’s then-current complete policy on the topic. You are also encouraged to ask questions of your manager, the Human Resources Department, the Legal Department or one of us.

All of us are expected to know and comply with the Code and any other policies that relate to our job duties and conduct. If you have any questions or concerns about our expectations, we encourage you to seek answers from the many resources identified throughout the Code.

Thank you again for your ongoing dedication to System One and for doing your part to uphold our values and enhance our continued success.

TABLE OF CONTENTS

INTRODUCTION	1
1. Our Code applies to all of us	
2. Expectations for all of us	
3. Additional expectations for executives, managers, and supervisors	
4. Getting help and raising concerns	
5. No individual rights created	
6. Waivers of the Code	
OUR BASIC RESPONSIBILITIES	6
1. Observe applicable laws and regulations	
2. Avoid bribery	
3. Conduct business in a truthful manner	
4. Disclose relevant information in a timely manner	
5. Keep accurate records	
6. Follow Company policies and processes	
7. Honor agreements and promises	
8. Protect human health and safety	
9. Promote inclusion, diversity and accessibility	
OUR RESPONSIBILITIES TO OUR CLIENTS	9
1. Meet the client's expectations	
2. Treat clients fairly	
3. Always remain truthful and transparent in client dealings	
4. Protect the client's confidential data and privacy	
OUR RESPONSIBILITIES AS EMPLOYEES	10
1. Protect workers from injury and illness in the workplace	
2. Provide equal employment opportunity and avoid discrimination	
3. Forbid and prevent retaliation against employees who report misconduct	
4. Foster open communications	
5. Respond to employee suggestions	
6. Protect privacy of employee information	
7. Protect confidentiality of the Company's and its clients' internal information and trade secrets	
OUR RESPONSIBILITIES TO THE COMPANY AND ITS INVESTORS	12
1. Be diligent in carrying out the Company's business	
2. Wisely use Company resources and do not use them for personal use	
3. Protect company assets, including proprietary business information	
4. Don't speak on behalf of the Company	
5. Avoid conflicts of interest and promptly disclose them as they arise	
6. Refrain from giving or accepting excessive gifts and entertainment	
OUR RESPONSIBILITIES IN DEALING WITH BUSINESS PARTNERS AND SUPPLIERS	15
OUR RESPONSIBILITIES IN DEALING WITH COMPETITORS	15
OUR RESPONSIBILITIES TO THE COMMUNITIES IN WHICH WE WORK AND LIVE	16
1. Support and protect human rights and environmental sustainability wherever doing business	
2. Learn and follow local laws, standards and customs	
3. Stand up against and report human trafficking	

INTRODUCTION

1. Our Code applies to all of us

Throughout this Code of Business Conduct (“Code”), we refer to the “Company”. When we use this term, we are referring to System One Holdings, LLC and/or its divisions, which currently include, but are not limited to System One, Cimplifi, CM Access, Joulé, MOUNTAIN LTD, MOUNTAIN Wireless, NTP Wireless, and TeamPeople.

All employees of these companies and any other division of the Company are subject to and expected to know and follow this Code. This Code applies to all employees at all levels within our Company. No one is exempt from knowing and following our Code. Our Board of Directors is also subject to this Code.

The Company expects our business partners and all of the third parties and vendors with whom we work to comply with all applicable laws and to uphold the ethical standards embodied in this Code.

If you work with business partners and other third parties, strive to select companies and persons who have a reputation for abiding by the law and who engage in fair and honest business dealings. Where possible, we only want to do business with business partners and other third parties who share our fundamental values of honesty, lawful conduct, full accountability, compliance, fair competition, and striving to “do the right thing.” If you are working with a business partner or other third party that is acting contrary to our values, the standards in this Code, or the law, report the situation right away through the proper channels identified in this Code.

2. Expectations for all of us

There are certain basic principles that appear throughout this Code and that should guide our actions every day in our work with the Company:

- **Act ethically and with integrity.** Ethics and integrity are essential parts of your job; you are accountable for your actions.
- **Promptly report** any activity you think may violate the Code, Company policies, or the law – never ignore or cover up a possible violation. Timely reporting of any concerns will allow the Company to appropriately investigate the matter and, if appropriate, notify others that may be affected, such as clients or other third parties.
- **Cooperate with any Company investigation**, including those related to the Code, Company policies, or the law.
- **Never retaliate** against or victimize anyone for raising a question or concern, making a good-faith report of a possible violation of the Code, Company policies, or the law, or cooperating in an investigation or proceeding.
- **Be accountable** for your actions. Violating the Code, applicable laws, or Company policies is grounds for corrective action, up to and including termination of employment.
- **Know the Code** and the laws and policies that pertain to your job.
- **Ask questions** you have about the Code, Company policies, or the law.

3. Additional expectations for executives, managers, and supervisors

Our culture of integrity and compliance starts at the top. All members of management assume responsibility for those who report to them. If you are an executive, manager, or supervisor, you have even greater responsibility. To that end, it is an essential function of your job to:

- Lead by example and create an environment that supports and promotes our fundamental values of honesty, lawful conduct, full accountability, compliance, fair competition, and striving to do the right thing.
- Continually encourage your team to raise questions or concerns.
- Be available when employees, clients, business partners, and other third parties have questions or concerns.
- Respond appropriately when an employee brings a potential problem or complaint to you.
- Escalate through proper channels as needed while maintaining confidentiality as appropriate.
- Never retaliate, or allow others to retaliate, against an employee for raising a concern.



4. Getting help and raising concerns

At the Company, we believe speaking openly, and raising and addressing concerns early on, is a best business practice. We maintain an “open door” philosophy that is intended to support and foster our fundamental values. We respect honest communications, and any complaints or concerns raised in good faith. Protecting the Company’s culture of honesty, integrity, compliance, and accountability is all of our responsibility, and reporting violations of this Code, Company policy, or law is welcomed and critical to maintain our culture and fundamental values.

Speak up if you have a question or need to report a possible violation of the Code, the Company’s policies or the law. You have several options to report a concern:

- Talk to your Company manager, Human Resources, the Legal Department, or a member of the Company’s executive team. Human Resources can be reached at HumanResources@systemone.com or by calling 412.995.1900. The Legal Department can be contacted at Legal@systemone.com or by calling 412.995.1977.
- Call the Company’s hotline at 1.877.243.6878.
- Make a report to an appropriate governmental or law enforcement agency.

No Retaliation

All of us should feel respected, safe, and comfortable speaking up about our concerns. When reporting, you are encouraged to identify yourself, as this greatly assists the Company to understand and address the concern. But, you may remain anonymous when calling the Company’s hotline, unless doing so is prohibited by law or regulation.

If you ask a question, report possible misconduct, or take part in an investigation of an ethics and compliance matter, you are complying with the Code and doing the right thing. We will not tolerate any form of retaliation, victimization, or adverse action against anyone for making complaints or reports in good faith (that are true and accurate to the best of your knowledge), or for participating in an

investigation or proceeding relating to a report or complaint. Anyone who retaliates (or attempts to do so) will be subject to disciplinary action in accordance with Company policies.

What to Expect When Reporting

The Company will look promptly into all reported concerns with appropriate attention to confidentiality and take action when warranted. Corrective action for violations of this Code or Company policies will vary, and will depend on the nature and severity of the violation, as well as any applicable law and local regulations. Corrective action could include discipline, up to and including termination of employment. Some violations may also be reported to criminal or civil authorities, as required or appropriate. All of the above is subject to applicable law.

By using the reporting avenues above in “Getting Help and Raising Concerns,” you are helping the Company address and resolve issues before they become more serious, and enabling us to ensure that we are upholding our values and enhancing our collective continued success.



Cooperating with Company Investigations

All of us are expected to cooperate with any Company investigation including those related to the Code, Company policies, or the law.

Reporting Violations

While it is important to report a suspected violation of the Code, it is just as essential to do so honestly and ethically. You should not file a dishonest report, or give information that is not true and accurate to the best of your knowledge, for the purpose of:

- Retaliating against someone else
- Gaining an advantage in a personal conflict
- Harassing another employee

Knowingly filing a dishonest report, or a report for an improper purpose, or giving false information as part of an investigation is, in itself, a violation of the Code. Anyone who knowingly makes a false accusation or is uncooperative or untruthful during an investigation will be subject to disciplinary action in accordance with Company policies and applicable law.

NOTIFICATION OF EMPLOYEE PROTECTIONS UNDER 41 U.S.C. § 4172

In some cases, the Company may be a contractor or subcontractor to federal contracts. As such, we are notifying employees that no Company employee may be discharged, demoted, or otherwise discriminated against for disclosing information the employee reasonably believes constitutes evidence of:

1. Gross mismanagement of a federal contract or grant;
2. Gross waste of federal funds;
3. An abuse of authority relating to a federal contract or grant (defined as an arbitrary and capricious exercise of authority that is inconsistent with the mission of the Federal awarding agency or the successful performance of a contract or grant of such agency);

4. A substantial and specific danger to public health or safety; or
5. A violation of law, rule, or regulation related to a federal contract (including the competition for or negotiation of a contract) or grant.

Without fear of retaliation, you may disclose suspected wrongdoing described above to any of the following:

1. A Member of Congress or a representative of a committee of Congress;
2. An Inspector General;
3. The Government Accountability Office;
4. A federal employee responsible for contract or grant oversight or management at the relevant agency;
5. An authorized official of the U.S. Department of Justice or other law enforcement agency;
6. A court or grand jury; or
7. A management official or other employee of the contractor, subcontractor, or grantee who has the responsibility to investigate, discover, or address misconduct.

If you believe you have been subjected to reprisal for disclosing wrongdoing described above, you may submit a complaint to the federal awarding agency's Office of Inspector General within three years of the date on which the alleged reprisal took place.

Unless relief is denied, possible remedies include:

- Affirmative action to abate the retaliation.
- Reinstatement to the position last held before the retaliation, together with compensatory damages (including back pay), employment benefits, and other lost terms and conditions of employment.
- Payment of an amount equal to the aggregate amount of all costs and expenses (including attorneys' fees and expert witnesses' fees) that were reasonably incurred for, or in connection with, bringing the complaint regarding the retaliation, as determined by the head of the executive agency.

Additional details may be found in the full statute, 41 U.S.C. 4712.

NOTICE TO CALIFORNIA EMPLOYEES

Pursuant to California Labor Code Sections 1102-1106, this policy notifies the Company's California employees of their rights and responsibilities as a whistleblower under California law, including under Sections 1102.5(a)(right to disclose information to a government or law enforcement agency, a person with authority over the employee, or to another employee with authority to investigate or correct a violation of or noncompliance with a local, state, or federal statute, rule or regulation, or to testify before any public body conducting an investigation, hearing, or inquiry); 1102.5(b) and (c)(right to remain free from retaliation for exercising rights under Section 1102.5(a) or for refusing to participate in any activity that would violate any federal, state, or local statute, rule or regulation); and 1102.5(h)(right to remain free from retaliation because the employee is a family member to a person who has, or is perceived to have, engaged in any acts protected under Section 1102.5). As required under Section 1102.8,

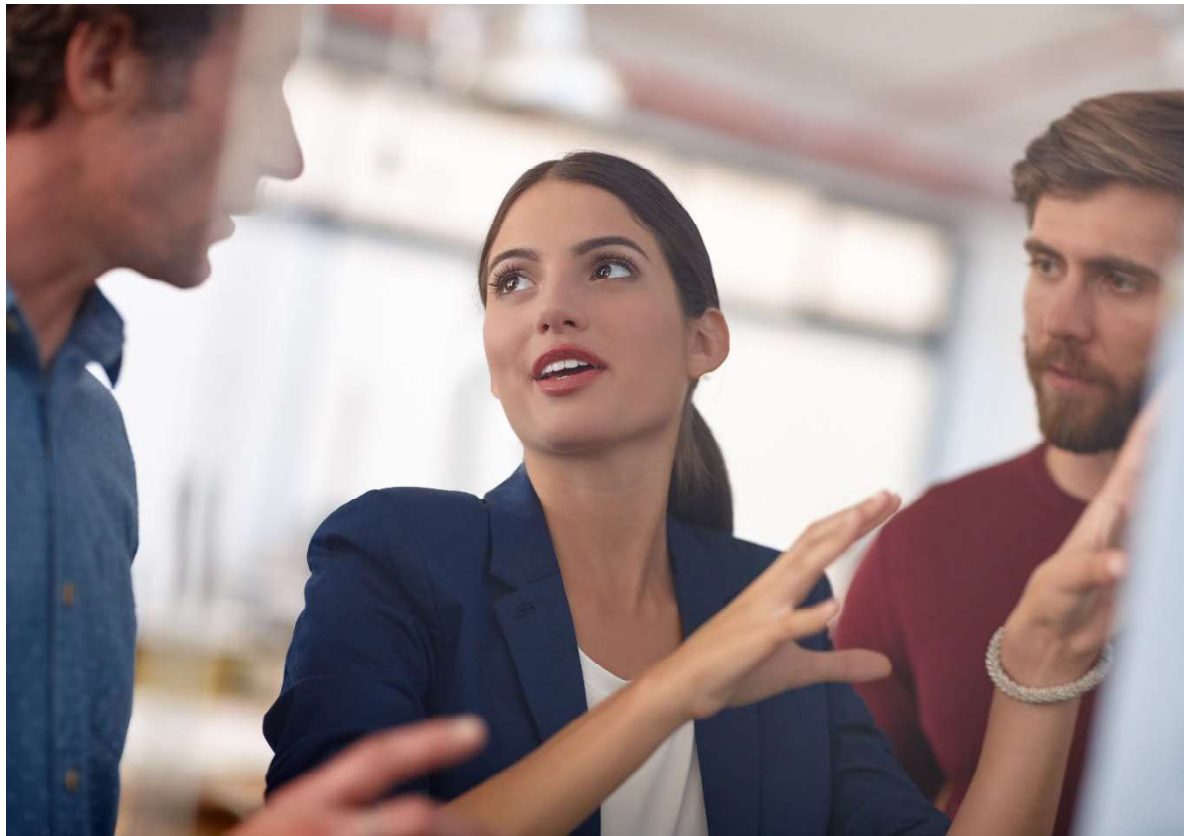
the current phone numbers to the California Attorney General’s whistleblower hotline are (800) 952-5225 and (916) 210-6276.

5. No individual rights are created

Nothing in or represented about this Code entitles any of us to remain employed by the Company for any specific period of time or under specific terms or conditions. Employment at the Company is not for a definite time period and may be terminated at any time by either the Company or the employee, for any reason or for no reason, and with or without notice (unless contrary to the terms of a written contract signed by an appropriate representative of the Company). The Company also retains the right to unilaterally modify the Code and Company policies at any time, without advance notice, to the extent permitted by applicable law.

6. Waivers of the Code

Waivers of this Code for executive officers or Directors of the Company are only permitted when approved in writing by the Board of Directors or a Committee of the Board. Any other waiver of any policy or part of this Code must be in writing and signed by the Company’s President and Chief Executive Officer.



OUR BASIC RESPONSIBILITIES

1. Observe applicable laws and regulations

The Company endeavors to comply with the law in everything we do. All personnel must respect and obey the applicable laws of the locations in which we operate. We don't expect you to know the intricate details of all laws that apply to the Company. As such, we encourage you to seek advice from your managers or the Legal Department as questions arise. It should go without saying, but in the event of a conflict between a law and any policy in this Code, always comply with the law.

2. Avoid bribery

We do not engage in, tolerate, or permit bribery, corruption, or similar unethical business practices. This means that, among other things, we all must follow all federal, state and global anti-corruption laws, including the U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act, in all of our business dealings, including those which occur outside of the United States.

No Company employee or other person working on the Company's behalf may offer, authorize, give, request, or accept any bribe to or from any person, whether the other party is a government official or otherwise.

We strive to work with suppliers and third-party business partners who share our values of compliance with applicable law. If you are responsible for hiring or engaging a third party, make sure you know they are reputable.

If you are offered a bribe, no matter how small, you must refuse it and clearly state that it is the Company's policy never to engage in bribery or corruption. You should then immediately report it, using the policy outlined in the Code.

In some circumstances, particularly if the third party is dealing with government entities on our behalf, additional due diligence may be required. If you work with government officials or hire third parties to work with government officials on the Company's behalf, request guidance from the Legal Department.

If you have concerns that any of our suppliers and business partners may not be meeting our standards, report it using one of the avenues in the Code.

3. Conduct business in a truthful manner

We do not engage in dishonest business practices. Acting ethically and with integrity is an essential part of all of our jobs—including for every supervisor, manager, and executive—and requires that we are always honest in our dealings with each other, and with our clients, business partners, and other third parties. Always act honestly, even when no one is looking. Prohibited dishonest business conduct can include:

- Knowingly making false or intentionally misleading statements
- Purposely omitting information (or presenting incomplete information) to mislead others
- Falsifying Company records (including payroll and timekeeping records, expense reimbursement requests, purchase orders, or other records)
- Theft or fraud
- Financial wrongdoing of any kind
- Use of Company credit cards, accounts, tools, equipment, software for purposes not authorized by the Company's management

Bottom line: always be truthful and act honestly when performing your duties or speaking on behalf of the Company.

4. Disclose relevant information in a timely manner

Whether it is a client's complaint, a financial problem for the Company, a possible breach of contract, or any potential violation of this Code, a Company policy, or any law, report, report, report! The sooner problems are reported and addressed, the chances for achieving the best outcome, even under trying circumstances, are increased. Timely reporting will allow the Company to investigate and, if necessary, promptly notify affected external parties.

5. Keep accurate records

Honest and accurate recording and reporting is necessary for us to make responsible business decisions. Business expenses must be documented and recorded accurately. If you are unsure whether a certain expense is permitted, ask your manager or consult the Company's rules and guidelines regarding permissible business expenses.

All of the Company's books, records, accounts, and financial statements must be maintained in reasonable detail, appropriately and accurately reflect the Company's transactions, and conform both to applicable accounting and legal requirements as well as the Company's system of internal controls. All employees should report to the Company any questionable accounting or auditing matters or practices that come to their attention.

Take proper care to maintain the Company's business information in a way that allows the Company to access it when needed. Do not delete the Company's business information, including records, communications, emails, and the like. And, be sure to comply with any litigation hold or other request for information from the Company's management.

6. Follow Company policies and processes

Where the Company has a policy or process in place, make sure to follow it. We implement policies and processes to ensure that we are compliant with applicable laws and regulations, whether it be employment laws, privacy laws, safety regulations, or any other law that applies to us. We expect employees to know and comply with those policies and processes, and to ask questions if they need guidance. And, if you want to use a form that is different than the one that the Company has authorized you to use, such as a customer contract, offer letter, or other similar document, you need to get approval from the Company's CEO, COO, CFO, Legal Department, or the Human Resources Department to do so. If you're unsure about the process, ask Human Resources or the Legal Department.

7. Honor agreements and promises

It's simple: our word is our bond in all that we do, whether we've made a promise or agreement orally, electronically, or in writing. So, be careful and think twice before making such a commitment on behalf of the Company. Where the Company has made such a commitment, plan to honor it unless you think doing so could be a violation of this Code, a Company policy, or the law—and then report the situation immediately to your supervisor, manager, or other appropriate person.



8. Protect human health, safety, and the environment

We strive to provide each employee, client, business partner, and other third parties with a safe, supportive, and healthy work environment. In turn, every Company employee can help maintain this type of workplace by knowing and following our safety and health rules, and promptly reporting accidents, injuries, and unsafe conditions. The same is true when we are working at a client's site. Even when we are "guests," always watch out for the safety of others around you. As best as possible, strive to report to work "ready to go" each day and in a physical, mental, and emotional condition that permits satisfactory and safe performance of all your assigned duties.

Violence, bullying, and any threatening behavior—whether verbally, electronically, or by any other means—are not permitted. If you see or hear of any such inappropriate conduct, we strongly encourage you to report it immediately to your manager or Human Resources.

We also strive to help protect the environment and conserve energy and natural resources where possible. We encourage employees to be environmentally responsible in the workplace and in the communities in which we live and work.

9. Promote inclusion, diversity and accessibility

We promote inclusion and accessibility, and value the diversity in our employees, clients, and suppliers. As a Company that serves many industries and different geographic areas, we greatly appreciate and value the importance of having an inclusive culture. This includes a diverse workforce as well as diversity among our clients, suppliers, and other business partners. We want everyone associated with the Company to always feel welcomed and valued.

We all must stay mindful and committed to fostering an environment of inclusion and of promoting diversity. We believe that fostering inclusivity strengthens our business and supports a culture where we are inspired to work hard, challenge ourselves, and be open-minded and innovative in our thinking. We consider the unique backgrounds, experiences, and identities of everyone to be key drivers in our future growth and success.

To that end, we are all reminded to treat others with respect; each of us has the right to expect a workplace in which the differences we bring are welcomed and valued. We also must expect the same level of commitment to a diverse workforce from those with whom we do business.

OUR RESPONSIBILITIES TO OUR CLIENTS

1. Meet the client's expectations

An important goal of the Company is complete and repeated client satisfaction; these are key factors in our formula for long-term success. Client satisfaction is achieved through listening, hard work, integrity, loyalty, respect, reliability, accountability, and keeping one's word.

All Company employees must remain committed to supplying services that exceed our clients' expectations of quality, timeliness, reliability, accountability, safety, delivery, and service.

2. Treat clients fairly

Treat clients like you expect and wish to be treated—always. Do not take advantage of any client situation in any way that could harm the client in its business or property, or to provide you with a personal gain or advantage unknown to the client and unrelated to doing your job for the Company.

3. Always remain truthful and transparent in client dealings

Our reputation has been built over many years based on honest and transparent dealings with our clients. You are expected to uphold and build on our reputation in all of your interactions with our clients. We want our clients to feel confident in telling others, "Not only is the Company good at what they do, but you can trust them."

4. Protect the client's confidential data and privacy

Pay attention to the information and data any client is entrusting to you. Keep close track of it. Keep it secure within electronic systems and physical offices, and if you are carrying it with you for work purposes outside of our or our client's property. Assume the information and data is confidential and that the client wants the Company to keep it confidential.

Do not publicize any client's information or data outside of the Company, including on social media, unless the client has expressly authorized and consented for you to do so. It's the client's information and data; do not treat it publicly as if it was Company's or your own. But, treat it confidentially as if it was Company's or your own.

If you have any knowledge that a client's information or data has been breached or compromised, report the situation immediately to the Legal Department.



OUR RESPONSIBILITIES AS EMPLOYEES

1. *Protect workers from injury and illness in the workplace*

Stay alert and pay attention to any safety-sensitive conditions or situations in the workplace. If you see or hear about any unsafe situation, speak up. The nature of our work means that many of our employees will be working on-site at a client's facility or work environment. Many of your workplaces will be controlled by our clients. We want to ensure that, regardless of where you work, your workplace is safe for you and those around you. If you see something that seems unsafe, whether in a Company office, on a client site, or otherwise in the course of your work, report the concern by contacting your Company supervisor or by using one of the reporting avenues above in "Getting Help and Raising Concerns."



2. *Provide equal employment opportunity and avoid discrimination*

We are firmly committed to providing equal opportunity in all aspects of employment and will not tolerate unlawful discrimination or harassment of any kind. We base employment decisions on legitimate business grounds, including qualifications, demonstrated skills, and achievements, without regard to age, race, gender, nationality, sexual orientation, gender identity or expression, physical ability, veteran status, or any other characteristic protected by applicable laws. We provide reasonable accommodations to employees and job applicants with disabilities or where otherwise expected by the law. The Company's policies covering equal opportunity employment, anti-harassment, anti-discrimination, and anti-retaliation are set forth in the Company's employee handbook. Read them. Learn them. Follow them.

3. *Forbid and prevent retaliation against employees who report misconduct*

The Company will not tolerate any form of retaliation, victimization, or other adverse action against any employee or anyone else for making a complaint or report in good faith (i.e., that are true and accurate to the best of your knowledge) of a violation or possible violation of this Code, any Company policy, or the law, or for participating in an investigation or proceeding relating to a report or complaint. Anyone who retaliates or attempts to do so will be subject to disciplinary action in accordance with Company policies and applicable law.

4. *Foster open communications*

We are all better employees and a stronger and better Company when we communicate with each other. Encourage a communication culture and open expression of ideas. Remain respectful to others' ideas even when you disagree. Good-natured banter sometimes is going to happen; disparaging, shaming, or belittling others should not.

5. *Respond to employee suggestions*

If you are a supervisor, manager, or executive who has received a good-faith suggestion from any employee or colleague, try your best to respond to the employee who made the suggestion. Doing so will help foster our goal of having an open communications culture. Even if you disagree with the suggestion, please try to respond—respectfully, of course—and thank the employee or colleague for making the suggestion.

6. *Protect the privacy of employee information*

Protect the privacy of personal employee information. During the course of your employment with the Company, you may need to disclose to the Company and/or to some of its third-party providers Personal

Identifying Information (PII) or Private Health Information (PHI). You also may come across or hear about a fellow employee's PII or PHI. Be very cautious and respectful of this information, including of your own. To the extent possible, and except where it's necessary to share for a work-related purpose (i.e. with Human Resources), avoid speaking with other employees about your or another employee's PII or PHI. And, if you handle PII or PHI in the course of your work for the Company, be sure to comply with the Company's policies about handling that information and, of course, the law.

7. Protect confidentiality of the Company's and its clients' internal information and trade secrets

Comply with your obligations not to use or disclose the Company's and its clients' information. All of us by law, through any non-disclosure agreement entered into with the Company or its clients, and pursuant to an applicable Company policy, are obligated to protect the confidentiality of the Company's or its clients' internal business information and trade secrets. Except for your always-protected right to make a report or complaint of a possible violation of law to an appropriate governmental agency, or as authorized by the Company to perform your job for the Company, you are prohibited—both during or after your employment with the Company—from possessing (in hard copy or any electronic form), using, or disclosing the Company's and its clients' internal and confidential business information, including any trade secret information, outside of the Company or for any personal or other purpose other than for the Company's business purposes. This information is the Company's (or its clients'), not yours.



OUR RESPONSIBILITIES TO THE COMPANY AND ITS INVESTORS

1. Be diligent in carrying out the Company's business

For the Company to be successful, profitable, and to grow, all of us must remain committed to completing, to the best of our ability, each task at hand. Stay focused. Stay committed. Leave no required task undone. This type of diligence will enable the Company to thrive, which will benefit all of us as well as our investors, clients, third-party business partners, and the communities in which we work and live.

2. Wisely use Company resources and do not use them for personal use

Be smart about using the Company's property and resources. Theft will not be tolerated—ever. Also avoid engaging in waste, fraud, and abuse, which can have a direct and very negative impact on our customer and federal contractor relationships, as well as the Company's bottom-line profitability. Only use the Company's property and assets for legitimate business purposes, and not for non-Company business (except for incidental personal use which may be permitted with the Company's prior knowledge and authorization). Any suspected incident of theft, fraud, waste, or abuse should be immediately reported to your manager, Human Resources, the Legal Department, or as otherwise set forth in this Code. Be smart.

3. Protect company assets, including proprietary business information

All of us must protect the Company's assets. This obligation covers the Company's physical property and equipment, money, and proprietary information, such as intellectual property, patents, trademarks, copyrights, and trade secrets. These assets also include the Company's internal business information, such as its business, marketing and service plans, product and services ideas, designs, databases, accounting and financial records, client lists, client and industry contact information, client and competitor industry data, any unpublished revenue, profit, or other financial data, and other internal business data, reports, or memoranda. Never use the Company's or its clients' confidential business information for your own personal gain or for the benefit of any unauthorized person.

Be careful when communicating or using confidential Company or client information. Share it only with those who are authorized and need it in order to do their jobs. Comply with confidentiality and non-disclosure provisions of any agreements that you signed when you were hired by the Company. If you have additional confidentiality obligations to a client, you must comply with those too. Our agreements require us to protect confidential and proprietary Company and client information, even after your employment with the Company ends.

4. Don't speak on behalf of the Company

We must ensure that information shared about the Company is consistent, accurate and complete. In order to ensure that accurate and complete information is conveyed to the public, to the authorities and to others, we have designated individuals to serve as our official Company spokespersons. Unless you are authorized by the Company's management to do so, do not make any public statements on the Company's behalf. You should review the Company's Social Media policy for more information. In addition, below are a few guidelines to help you handle interactions with the public, the authorities and the media:

- Refer all media inquiries and public requests for information to the Company's Marketing Department.
- Refer all requests for financial information to the Company's Finance Department.
- Refer all public requests for information and inquiries from government and regulatory agencies to the Company's Legal Department.

- When using social media:
 - Clearly state that any opinions you express about our company are your own and do not reflect those of the Company.
 - Don't disclose confidential business information about the Company or our clients, business partners, suppliers, or other business relations.
 - Don't post anything that's confidential business information, discriminatory, or would constitute a threat, intimidation, harassment, or bullying.

5. Avoid conflicts of interest and promptly disclose them as they arise

We must all avoid conflicts of interest and circumstances that reasonably present the appearance of a conflict. A conflict of interest occurs when your private interests interfere, or appear to interfere, with the business interests of the Company. It's important to avoid situations where your personal interests (or those of family members) impair or may impair your ability to perform your job for the Company objectively and effectively.

Avoid accepting advisory positions (formal or informal) or board seats with the Company's clients, competitors, and suppliers when your judgment could be, or could appear to be, influenced in a way that could undermine or otherwise harm the Company. Notify your manager before accepting a board seat with any outside company or organization, and managers who receive that information, must notify the Legal Department. The Company Board members and employees who are a Director level and above must first notify the Legal Department before accepting any board position. Don't start your own business or consult/advise for any business if it will or does compete with the Company.

It's almost always a conflict of interest for you to work simultaneously on behalf of the Company and for a client, competitor, or supplier of the Company. While you are employed with or working for the Company, and except solely for the Company's business purposes, you are not permitted to work on behalf of a client, competitor, or supplier of the Company, in any capacity, unless approved in advance and in writing by the Company. The best policy is to avoid any direct or indirect business connection with our clients, competitors, and suppliers, except when working for and on behalf of the Company.

In addition, you should not have a financial interest in any Company client, competitor, or supplier, if that interest presents a conflict or the appearance of a conflict with your employment with the Company or with any aspect of our businesses.

It is also a conflict of interest for you to encourage a client or prospective client of the Company's to cease or limit doing business with the Company and/or to do business with a competitor, or to directly or indirectly, alone or with others, contact or communicate with any Company employee, consultant, or independent contractor to solicit, recruit, or hire that person to work somewhere other than for the Company or to induce or encourage that person to end their employment or other business relationship with the Company.

While there are many ways in which a conflict of interest or appearance of one can be created, what is clear is that conflicts of interest are prohibited as a matter of Company policy, unless specifically approved in writing by the Company's CEO and a board member.

Because conflicts of interest also may not always be clear-cut, if you have a question, you should consult with your manager or the Legal Department. Anyone who becomes aware of a potential or actual conflict of interest, or knows of any material information that reasonably could give rise to a conflict, should promptly bring it to the attention of their manager, Human Resources, another appropriate management-level person at the Company who is not involved in the situation at hand, or to the Legal Department. If

appropriate, consult and follow the reporting procedures described in this Code. All actual or apparent conflicts of interest between personal and professional relationships must be handled honestly, ethically, promptly, and in accordance with the policies specified in this Code or as required by law.

You should refer to the Company's Conflict of Interest Policy, which can be found in the Company's employee handbook, for further information about conflicts of interest.

6. Refrain from giving or accepting excessive gifts and entertainment

While we want to encourage goodwill, we must not give or accept gifts or business entertainment that is not proper. The purpose of business entertainment and gifts in a commercial setting is to create goodwill and sound working relationships. No gift or entertainment should ever be offered, given, provided, or accepted by you (or any family member) unless it: (a) is not a cash gift, (b) is consistent with customary business practices, (c) is not excessive in value, (d) cannot be construed as a bribe or payoff, and (e) does not violate any Company policies, laws, or regulations.

With respect to doing business with the government and government officials, the Company strictly prohibits any payments, gifts, or providing anything of value to officials or representatives of any of our governmental clients or contractors. Period.

You are always free, however, to make normal individual political contributions to political candidates, parties, or organizations of your choosing and as allowed by law.

Note also that it is unlawful under the U.S. Foreign Corrupt Practices Act and the laws in many countries for employees, officers, directors, contractors, or other third parties working on our behalf to give anything of value, directly or indirectly, to officials of foreign governments or foreign political candidates in order to obtain or retain business or secure an improper advantage. The Legal Department can provide additional guidance.

OUR RESPONSIBILITIES IN DEALING WITH BUSINESS PARTNERS AND SUPPLIERS

Our business relationships with our suppliers, business partners, and other third parties impact our business success in many ways, including (a) by allowing us to obtain the equipment, supplies, and services we need to operate and grow our business successfully; and (b) in promoting our reputation in the industry as a well-run and honest business partner.

When you are dealing with our suppliers, business partners, and other third parties, adopt and follow these standards:

1. Engage in fair and honest dealing
2. Prefer suppliers/partners who engage in honest business practices
3. Prefer suppliers/partners who adhere to applicable health and safety, environmental, business competition, and labor and employment laws
4. Prefer suppliers/partners who promote human rights and diversity
5. Refrain from giving or receiving excessive gifts, entertainment, or bribes
6. Make sure an approved agreement is in place with the supplier/partner and that you have authority to enter into it on behalf of the Company
7. Communicate any contractual or legal responsibilities at the outset to your manager and applicable back office departments, including the Finance Department, the Legal Department and the Human Resources Department to enable the Company to comply with all of its obligations



OUR RESPONSIBILITIES IN DEALING WITH COMPETITORS

Our competitive advantage is the superior performance of our business and the services we provide. We are proud to gain our advantages honestly, and through our hard work, diligence, and our collective ingenuity. Yes, we want to beat our competitors—but not through unethical or illegal business practices.

Never take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, knowing misrepresentation of material facts, or any other intentional or unfair act. Always remain honest and transparent in your work on behalf of the Company. Adopt and follow these standards with respect to our competitors:

1. Engage in fair competition and honor business competition laws
2. Respect competitors' intellectual property rights and restrictive covenants
3. Gather competitive intelligence through lawful means
4. Refrain from colluding with competitors
5. Refrain from knowingly making false statements about competitors
6. Do not use or disclose the confidential information of your former employers

OUR RESPONSIBILITIES TO THE COMMUNITIES IN WHICH WE WORK AND LIVE

1. Support and protect human rights and environmental sustainability wherever doing business

We are committed to acting as a good corporate citizen in the communities where the Company operates. We support and respect efforts to protect human rights and environmental sustainability wherever we do business. We also believe it is important to seek out employees, clients, business partners, and other third parties who do so as well. We strive to look for ways to reduce waste and use energy and resources more efficiently.

As individuals, we are encouraged to care about the less fortunate, and to give back to the communities where we live and work. However, if you choose to engage in a charitable cause, remember you should do so on your own time and at your own expense, unless you have received the approval of the Company's CEO, COO or CFO. You should avoid giving the impression that, because you support a cause personally, the Company supports it; unless the CEO, COO or CFO authorizes you do so, you are not permitted to hold yourself out as representing the Company. When the Company does choose to support a particular cause or charitable organization, you are always welcome, but not obligated, to participate.

2. Learn and follow local laws, standards, and customs

Working in a number of different communities and cultures requires us to be diligent in learning and observing local laws, standards, and customs. Yes, easier said than done. But, keep your eyes and ears open. Ask questions of other Company employees who previously have done business in the areas where you are working. Ask our clients and business partners who are operating in these areas about any local laws, standards, or customs concerning which you should be aware. Consult with our Legal Department as necessary or as any issues arise.

3. Stand up against and report human trafficking

We respect human dignity and human rights wherever we do business. We ensure that all of our employees work out of their own free will. We do not accept corporal punishment, forced involuntary labor, or other forms of mental and physical coercion. We do not use or permit the use of child labor. It should go without saying that the Company strictly prohibits employees from soliciting or engaging in: (a) prostitution, (b) trafficking in persons, and (c) forced labor.

If you see or hear something that could be contrary to this prohibition, or that seems questionable, you have an affirmative obligation to timely report any information received from any source. The Company will take appropriate disciplinary action—including, but not limited to, termination and reporting to law enforcement—against anyone who violates this prohibition.



Document History

Date	Version	Description of Modification	Modified by
12.16.2021	1	Initial production	Legal
02.04.2022	2	Revised titles and branding and other minor modifications	Legal
02.01.2023	3	Review and minor updates	Legal