



# CODE OF CONDUCT

2024



Kevin Kelly  
Chairman and Chief Executive Officer

# MESSAGE FROM THE CHAIRMAN AND CHIEF EXECUTIVE OFFICER

I am pleased to provide you with our code of conduct. At Arcfield, we are entrusted with critical missions in the space, defense, intelligence and civilian government markets.

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 our company values means striving to be the best in everything we do and approaching our mission, our colleagues and the business with the utmost integrity. These values are more than just words on a page—they are a call to action that guide everything we do. Demonstration of ethical behavior on an organizational scale is neither accidental nor unintentional. Rather, it is deliberate and purposeful, requiring strong interpersonal relationships built on respect and mutual trust.

It is vitally important for each of us to maintain a commitment to conducting our business with the highest ethical standards. By doing so, we will continue to advance the mission, empower our people, and grow our business—the right way.

## CREDO

### MISSION | PEOPLE | BUSINESS

We are unified in putting the mission first, because the security of our nation is what's at stake. But we know that we can't do it without the diverse experience and unmatched skill set of our people. We believe by fostering an environment that is driven by innovation and empowers its people that we can accelerate mission success for our partners and ensure our longevity as a company.



#### ADVANCE THE MISSION

We stand shoulder to shoulder with our customers to put their missions first, challenging the status quo by delivering innovative solutions and exceptional service to ensure mission success.



#### EMPOWER OUR PEOPLE

We celebrate the creativity and impact of our team, invest in their professional growth, and encourage a diverse and inclusive environment.



#### GROW OUR BUSINESS

We deliver on a promise of innovation and growth while remaining committed to operating as an efficient and thriving business.

## MISSION

We support the nation by creating a technological advantage for our mission partners and by solving the most complex and demanding national security and space-related challenges.

## VISION

To become a partner of choice to defense, intelligence and space agencies in response to a rapidly evolving threat landscape. And to foster an environment that is driven by innovation and creativity and empowers our people to do their best work.

“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





Elizabeth Deardorff

VP, Deputy General Counsel  
Ethics and Compliance Officer

# MESSAGE FROM THE ETHICS AND COMPLIANCE OFFICE

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 upholds and promotes the highest ethical standards.

Our code of conduct (the Code) as well as supporting policies, guidance documents and related training provide the framework for you to meet the company's expectations in performing your work. If you find yourself in a situation where you do not know what to do, reach out for guidance. Your manager, human resources, security and the Ethics and Compliance Office (ECO) are available to provide answers.

Your obligations are to:

- Read the Code and be accountable for your own conduct
- Review Arcfield's policies, which are updated periodically, in the policy library on The Arcway
- Complete all assigned compliance training in a timely manner
- Report possible violations of the Code, company policies, applicable laws and regulatory requirements through any of the available reporting options described in the Code

Ethics issues and concerns can be reported in a variety of ways, including anonymously through our ethics helpline. We expect our employees to behave with integrity and will hold them accountable if we find misconduct.

We will never retaliate against anyone who, in good faith, reports ethics or compliance concerns. In fact, people who raise concerns play an important role in helping maintain our ethical workplace.

If you have any questions about the Code, please reach out to me at [ethics@arcfield.com](mailto:ethics@arcfield.com). I also invite your feedback and comments to support our continuous improvement.

Elizabeth Deardorff

VP, Deputy General Counsel

Ethics and Compliance Officer

# 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. Please read the Code, carry out business activities in accordance with it, and raise questions if you have concerns or need clarification.

## 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"**

If you believe that a violation of the Code has occurred, or if you are asked to violate the Code, you have the responsibility to promptly report the incident.

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

- Another manager
- ECO at [ethics@arcfield.com](mailto:ethics@arcfield.com)
- Chief Legal Officer
- Human resources
- Security

For the U.S.:

- Ethics helpline at 855-222-4894 or [www.lighthouse-services.com/arcfield](http://www.lighthouse-services.com/arcfield) (where concerns may be raised anonymously)

For Canada:

- Clearview ethics helpline at 1-844-866-8480 or [www.clearviewconnects.com](http://www.clearviewconnects.com) (where concerns may be raised anonymously)

Speaking up to report questionable conduct protects our ethical work culture and our company.

## Our actions matter

Managers are responsible for encouraging employees to speak up and raise issues or concerns. Modeling ethical behavior 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 our

job duties on behalf of the company in compliance with the laws and regulations where we operate. The legal department and the ECO are always available to help you understand the laws and regulations that apply to your job. But upholding our values and the Code require more than mere compliance with laws and regulations.

## 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 company policy.

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

## 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—ensuring that they are accurately recorded and charged to appropriate cost objectives—and where applicable, 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 timekeeping violates company policy and the law.

Employees must not 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/or organizations must be promptly and accurately recorded. Under no circumstances may you misrepresent facts or falsify records.

Employees who mischarge their time or expenses 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 anyone who may be responsible for a violation due to inadequate supervision.

Based on 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 an involuntary separation of employment. Civil or criminal prosecution by the U.S. government is also possible.

## WE DO NOT DISCLOSE NONPUBLIC INFORMATION

In your work, you may have access to information about our

company or a third party that is not available to the public. Such 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 the ECO or legal before acting.

#### **WE COMPETE VIGOROUSLY AND FAIRLY**

The company will not use a substantial market position to establish restrictive practices that diminish competition unless there is a valid business justification or consumer benefit and it is 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 an 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 you 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.

We will cooperate with government representatives in audits, investigations and other inquiries conducted by government authorities pursuant to legitimate information and investigative requests. To the greatest extent possible, the company cooperates with government agencies responsible for investigating suspected violations of the law.

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 aspects of the business. 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 are subject to inspection without prior notice while on company premises.

#### **WE COMPLY WITH LAWS AND REGULATIONS GOVERNING POLITICAL CONTRIBUTIONS AND LOBBYING**

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

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

#### **WE ENCOURAGE CIVIC PARTICIPATION**

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 marketing and communications before 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 are required to consult with the ECO or legal in advance to resolve any potential conflicts of interest.

#### **WE DO BUSINESS ETHICALLY OUTSIDE THE UNITED STATES**

The company's commitment 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 the ECO or legal on how to resolve the conflict.

#### **Anti-corruption**

You must 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 from corruptly giving, offering, or promising anything of value to foreign officials or foreign political parties, officials or candidates—whether directly or indirectly—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. See LGL-14 Anti-Corruption.

#### Export/import and other trade restrictions

You are required to comply with all export and import laws and regulations that govern the transfer of certain technical data, equipment and technology between countries. 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. You are responsible for consulting with the company's International Trade Compliance Office (ITCO) before negotiating any international transaction. See Arcfield's LGL-10 ITCO policies in the policy library on The Arcway.

#### Anti-boycott

The Anti-Boycott act prohibits U.S. federal contractors from engaging in activities that support a boycott maintained by a foreign country against a country that is friendly to the U.S.—this is considered an unsanctioned foreign boycott. We do not cooperate with any requests to support an unsanctioned foreign boycott.

You must not, on behalf of the company, enter into a contract containing such boycott provisions or provide any information about our company's (or any person's) past, present or prospective relationship with such boycotted countries. You must not take any action that would cause the company to deal with potential or actual customers, suppliers or others in support of an unsanctioned foreign boycott, or otherwise engage in or support restrictive international trade practices or unsanctioned foreign boycotts. If you receive a request to engage in an activity that supports an unsanctioned foreign boycott, you must immediately report such request to the company's empowered official in the ITCO, the ECO or legal. Doing so allows the company to meet its required reporting requirements.

#### Anti-money laundering

You are prohibited from participating in any money laundering transaction or activity that would introduce illegitimate funds into the legitimate financial system.

#### Combatting human trafficking, forced labor and child labor

You are prohibited from participating in any human trafficking, forced labor or child labor-related activities at any time. Prohibited practices include procuring commercial sex acts, using forced labor, using misleading or fraudulent recruiting practices, using recruiters that do not comply with local labor laws in the country that the recruiting takes place, or destroying, concealing, confiscating, or otherwise denying access by an employee to the employee's identity or immigration documents.

See Federal Acquisition Regulation (FAR) 52.222-50 for a list of all prohibited practices. You are required to report good faith concerns that an employee, subcontractor employee, consultant or agent has engaged in any of the prohibited practices. Report such concerns to the ECO or legal. You can also contact the Global Human Trafficking Hotline by calling 1-844-888-FREE or emailing [help@befree.org](mailto:help@befree.org).

The company will take appropriate disciplinary action, up to and including involuntary separation of employment, against any employee found to be involved in human trafficking or who failed to make a report despite having a good faith concern.

#### DIVERSITY, INCLUSION AND EQUAL OPPORTUNITY

Our success hinges on our ability to attract, develop and retain talented individuals with a diverse range of viewpoints to help solve our partners' most complex challenges. To achieve this, we all share a responsibility to cultivate an inclusive work environment that fosters professional growth and achievement for everyone.

We ensure that employees and candidates for employment are afforded equal opportunity in all employment actions. See Arcfield policy HR-002 Equal Employment Opportunity and Affirmative Action in the policy library on The Arcway.

#### WE PROVIDE A NON-DISCRIMINATORY, HARASSMENT-FREE WORK ENVIRONMENT

The company is committed to maintaining a workplace atmosphere that is free from discrimination and harassment. You are expected to maintain a professional work environment and treat all employees, customers, contractors, suppliers and others in the workplace with dignity and respect.

Harassment or discrimination of any kind—including on the basis of race, color, national origin, religion, sex, pregnancy, age (40 or older), physical or mental disability, ancestry, sexual orientation, gender identity, gender expression, genetic information, marital status, veteran status, military status, citizenship status, political affiliation or any other legally-protected characteristic—will not be tolerated.

If you believe you are being harassed, you should firmly and promptly notify the offender that the behavior is unwelcome. If such direct communication is ill-advised or proves ineffective, you should report it consistent with one of the avenues described in the Code. The company will investigate all allegations of harassment and discrimination consistent with its policies and take appropriate action. See Arcfield policy HR-001 Harassment-Free Workplace in the policy library on The Arcway.

## **WE DO NOT OFFER OR PROVIDE BUSINESS COURTESIES TO GOVERNMENT CUSTOMERS**

The regulations applying to the offering of business courtesies to government employees, officials and representatives of governments are complex. As a U.S. federal contractor, we make a clear distinction between how we interact with government customers and commercial customers. Broadly defined, business courtesies include gifts, meals, entertainment and travel. See LGL-015 Business Courtesies, and LGL-015.1 Guidelines.

The following are not considered business courtesies:

- Company informational material
- Light refreshments such as water, tea coffee and snacks (not meals) during business meetings
- Items of minimal value (e.g., pens with company logo offered at industry event)
- Certificates or plaques intended for presentation
- Discounts available to the public
- Anything for which the recipient pays fair market value

Government employees or officials:

- It is company policy that employees must not offer, give or promise to give, directly or indirectly, any government employee or government official (broadly defined) **anything of value**—including but not limited to gifts, meals, entertainment, travel, cash, gift cards, favors, credit or promise of employment
- In this marketplace, even the appearance of impropriety can be the basis for a bid protest or government inquiry

Giving to other government contractors:

- Other government contractors often have similar restrictions concerning the acceptance of business courtesies by their personnel, which should be respected in our dealings with them

## **WE MAY OFFER OR PROVIDE APPROPRIATE BUSINESS COURTESIES TO COMMERCIAL CUSTOMERS**

Generally, you may provide business courtesies of reasonable value to non-government commercial customers or potential customers in support of company business activities, provided that the practice is not for any improper purpose and does not violate, after reasonable inquiry, the standards of conduct of the recipient's organization. The business courtesy must also be consistent with marketplace practices, infrequent in nature and not lavish or extravagant, and in no way is charged to a customer. Examples of acceptable business courtesies could include an industry standard discount or occasional business meal associated with legitimate business discussions.

We limit any tangible gift (e.g., tickets to a sporting event, flowers or promotional items) provided to an actual or potential commercial customer to a market value of under \$50.00 USD. Any higher amount must be approved in advance by the ECO and your manager.

## **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

## **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, keychain, water bottle, visor, cup or glass, or similar items displaying a company's logo. Established routines and procedures should be followed in the procurement of all goods and services. See SCM-001 Procurement Policy; LGL-015 Business Courtesies.

## **ACCEPTANCE OF BUSINESS COURTESIES BY EMPLOYEES PERFORMING NON-PROCUREMENT FUNCTIONS**

Although you may not use your position at the company to obtain business courtesies, it is permissible to accept an unsolicited business courtesy offered to you, provided the item:

- Has a market value of \$50.00 USD or less
- 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 courtesies from the same entities or persons
- 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 ECO or chief legal officer. You may not solicit any business courtesies; that is always prohibited. It is your personal responsibility to ensure that your acceptance of a business courtesy does not create the perception that favors were granted to secure favorable treatment. See LGL-019 Personal Conflict of Interest.

### **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 courtesy that is not expressly permitted by the Code 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 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.

### **PERSONAL CONFLICT OF INTEREST GUIDELINES**

You are expected to identify and avoid any financial dealings, business activities, personal relationships or other situations that could potentially influence your ability to make objective and ethical business decisions for the company. This includes avoiding anything that might create the appearance of impropriety or harm the company's reputation, compromise your loyalty, or hinder your ability to fulfill your job duties. If such situations arise and cannot be avoided, you must disclose them to the ECO either beforehand or as soon as you become aware of the potential conflict. See LGL-019 Personal Conflicts of Interest.

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:

- Having a personal interest or potential for gain in any company transaction
- Placing business with a firm owned or controlled by the employee or employee's family
- Having a close personal relationship with a subordinate employee—see Arcfield policy LGL-019 Section 5.2(f)
- Working a second job with time or other commitments that limit the employee's ability to fulfill work commitments to the company

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 and the ECO. See LGL-019.F1 Conflict of Interest Disclosure Form.

### **WE AVOID ORGANIZATIONAL CONFLICTS OF INTEREST**

As a federal contractor, we are restricted from serving in conflicting roles. To safeguard impartiality and a level playing field, organizational conflict of interest (OCI) rules prohibit situations that might bias a contractor's judgment or grant them an unfair competitive advantage. To ensure that the company is free from or properly mitigates OCI issues, all new business opportunities are screened by the contracts personnel and sector

business and growth leads. If during the screening process a potential OCI issue is identified, the company will determine what course of action will be pursued.

Proactive screening and resolution of OCI issues ensures that we continue to uphold the highest standards of ethics and integrity as we participate in new business opportunities.

### **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.

To ensure compliance with relevant laws and regulations, the company conducts pre-employment screening of current and former government employees to identify any post-government employment restrictions that might limit their ability to perform work for us. Additionally, current government employees applying for positions must confirm compliance with their ethical obligations when seeking employment with us.

See LGL-13 Hiring Current or Former Employees. When in doubt, seek advice from 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 agree to comply with all applicable laws, regulations and contractual requirements of their engagement, such as the Arcfield Supplier Code of Conduct.

### **WE GUARD INFORMATION**

#### **We protect sensitive information**

Our customers trust us with their sensitive information, and it is our obligation 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 sensitive 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.

During normal business activities, suppliers, customers and

competitors may sometimes divulge to you information that is proprietary or sensitive to their business. You may only accept or use the proprietary or sensitive 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 or sensitive information from a supplier, customer or competitor without proper authorization, you must immediately bring this to the attention of the ECO or legal.

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

#### We protect personal information

While 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 the ECO or legal.

#### 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 conducting 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, an illegal act or a purpose that would cause embarrassment to the company. Use of corporate credit cards for personal use is strictly prohibited.

You have no expectation of privacy when using company assets, including company computers. By acknowledging the System Use

Monitoring Notice upon logging in to your computer, you consent to having your computer usage monitored and recorded.

## WE STAY FOCUSED ON SECURITY

### Facility security

Your company identification (ID) badge must be worn and visible at all times while on company premises. Employees should challenge persons not wearing a company ID badge, and report the loss or theft of your ID badge immediately to your manager and security.

You are responsible for following security protocols at your work location, including badging in and out of a building as directed or required.

If visitors are wearing badges indicating that they require an escort, they must be escorted by an employee at all times while within company buildings.

### Personal electronic device restrictions

To ensure the protection of classified information and mitigate the risk of the company experiencing contract award fee reductions, the company strictly prohibits the use of smartphones, cell phones, and other personal electronic devices (PEDs) in all classified or sensitive compartmented information facility (SCIF) areas. Other examples of PEDs not permitted include fitness trackers, smartwatches, USB devices, cameras, and devices with recording or data storage capabilities. Employees are subject to disciplinary action up to and including an involuntary separation of employment if they fail to follow PED restrictions.

## WE REPORT ADVERSE INFORMATION

Possession of a security clearance is a privilege, not a right. Under the National Industrial Security Program Operating Manual (NISPOM), the company is required to report any adverse information concerning cleared employees. Adverse information is any information that reflects negatively on the integrity or character of a cleared employee or suggests that the employee's 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 NISPOM, SEAD 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, personally identifiable information (PII)

and Controlled Unclassified Information (CUI). Built on continuous assessments, evaluations, and monitoring of our digital and physical environments, 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.

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 your responsibility to help protect our company and our information, so if you see something that is not in accordance with our values, ethics or commitments to ourselves and our government customers, 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, regulations and company policies. See the Environmental, Health and Safety section of the Policy Library.

You need to be mindful of risks at the workplace, observe all posted warnings, and never block exits, fire extinguishers or electrical panels with furniture or equipment.

You must promptly report 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.

### Workplace violence

If you experience or witness workplace violence, threats, or intimidation, report it to your manager, human resources, or security. This applies even if there's no direct threat, but you believe the behavior is threatening or violent and work-related. Report the presence or suggestion of a weapon immediately to a manager, security, or if appropriate, the police by calling 911.

### Drug, alcohol and smoke-free workplace

The company is committed to providing a drug, alcohol and smoke-free work environment. You may not possess, use or distribute illegal drugs at the workplace or while performing work for the company. You must perform your job duties unimpaired by illegal drugs or the influence of alcohol.

Marijuana remains an illegal drug under federal law (categorized as a Schedule I substance under the Controlled Substances Act). Although some states have recognized the recreational use of marijuana under state law, the company must comply with federal law under the Drug-Free Workplace Act. As such, marijuana will be treated as an illegal drug.

Consumption of alcohol for legal-aged employees may be authorized at company-sponsored or approved work-related functions either onsite or offsite in accordance with Arcfield's

HR-003 Drug and Alcohol-Free Workplace policy.

The company also maintains a tobacco- and smoke-free environment. You may not smoke 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, breaks, or lunch periods).

Employees may not use company assets or resources for solicitations or distribution of materials other than for company business purposes. Employees are not permitted to post posters, charts, notices or other display material 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 must acquire, use and dispose of them only in accordance with applicable environmental protection laws.

## MAKE THE RIGHT CHOICE QUIZ

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?
- 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 my embarrassment?
- 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 from the ECO on topics that are determined or governed by country-specific laws and regulations.**

# ABOUT THE ETHICS AND COMPLIANCE OFFICE

Reporting directly to the chief legal officer, the ECO oversees a vigorous company-wide program to promote an ethical work environment for all employees. The ECO provides guidance as it pertains to the code of conduct, conducts and manages investigations into alleged violations of the Code and other company policies, and maintains the confidential company ethics helpline. The ECO consults with and provides quarterly reports to the Compliance Leadership Council and the Board of Directors.

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

## Contact the Ethics and Compliance Office

FOR EMPLOYEES IN THE U.S.

Email: [ethics@arcfield.com](mailto:ethics@arcfield.com)

Ethics helpline:

*This helpline is maintained by Syntrio Lighthouse and available 24/7/365*

\*Call: [855-222-4894](tel:855-222-4894)

\*File a report: [www.lighthouse-services.com/arcfield](http://www.lighthouse-services.com/arcfield)

By mail:

Arcfield

Attention: Ethics and Compliance Office

14295 Park Meadow Drive

Chantilly, VA 20151

FOR EMPLOYEES IN CANADA

Contact the Ethics and Compliance Office

Email: [ethics@arcfield.com](mailto:ethics@arcfield.com)

Ethics Helpline:

\*Call: [1-844-866-8480](tel:1-844-866-8480)

\*File a report: [www.clearviewconnects.com](http://www.clearviewconnects.com)

\*Mail:

Clearview Connects

P.O. BOX 11017

Toronto, Ontario M1E 1N0, Canada

\*Allows for anonymous reporting