



AALYRIA

**CODE OF  
BUSINESS ETHICS & CONDUCT**

## **A LETTER FROM THE CHIEF EXECUTIVE OFFICER**

Aalyrians:

I am honored to work for a company that, at its core, focuses on a solid commitment to compliance and ethical behavior. Continued growth and success cannot happen unless the highest standards of integrity remain central to our company and is the foundation of our company. Our shared commitment to ethical behavior is a fundamental element of the value we bring to our customers, partners, contractors, suppliers, and each other.

A culture of integrity requires establishing relationships based on trust with our clients, suppliers, communities, and employees; compliance with laws and regulations; and personal commitment and responsibility to maintain the highest ethical standards of business conduct. Our Code of Business Ethics and Conduct is designed to assist us along that path. The Code communicates our context and intent and reiterates our expectations for all employees, contractors, agents, consultants, members of the Board of Directors, and anyone else representing or acting on behalf of Aalyria.

Because ethical conduct is critical to our company's success, each of you should keep this Code in a convenient place for easy reference. I invite all of you to read it and, while doing so, to reflect on your role in helping the Company uphold the highest standards of ethics and integrity.

Our mission requires a risk-informed and learning organization, and our goal is for the Code to meet the challenges of our dynamic environment. Please communicate your comments, and any recommended improvements and enhancements to the Code to the Legal, Compliance and Policy Office. If you know of something that conflicts with a stated principle in this Code, you are obligated to report it. We commit to you that Aalyria will honor the courage of those who identify existing or potential issues, and we will not tolerate retaliation against employees who raise legitimate ethical concerns.

Everybody I know wants to be part of a team bigger than themselves – you are on that team. Thank you for always striving for excellence; doing what is legally, morally, and ethically sound; and treating people with dignity and respect.

Sincerely,

Dr. Brian Barritt

Chief Executive Officer

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		Revision # 0	Original
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## 1.0 A Culture of Integrity

Aalyria Technologies Inc. and its subsidiaries (herein, “Aalyria” or the “Company”) are committed to conducting business honestly, ethically, and in accordance with applicable laws and regulations of the United States and other countries and jurisdictions in which we operate. We are also committed to the highest ethical standards, and all employees and applicable third parties are expected to adhere strictly to our Code of Business Ethics and Conduct (the “Code”).

Legal and ethical business practices form the core of the Company’s values and mission. Our goal is to be the market leader in all of our service offerings, while never compromising our commitment to our core values and our reputation. A substantial portion of the Company’s business is with the United States government. This Code addresses Company policy relating to such government business, as well as to our commercial business. This Code of Business Ethics and Conduct applies to all subsidiaries, as well as officers, employees, and members of the Board of Directors, and also “third parties,” which include independent contractors, subcontractors, agents, consultants; anyone representing or acting on behalf of the Company.

All Aalyria and subsidiary company employees and independent contractors (collectively, “employees”, as well as third parties acting on behalf of Aalyria, who receive this Code are required to read it and follow its provisions. Employees and third party service providers are obliged to seek assistance or clarification to avoid unethical or illegal business conduct prior to taking a questionable action. There are several avenues available to employees who have concerns or questions of an ethical or compliance nature, including contacting supervisors, managers, or the Aalyria Chief Legal Officer or his designee. Also, company and agency hotlines are made available for reporting ethics related issues as a backup to the ordinary chain of command reporting procedures. Third party service providers seeking guidance can contact their Aalyria point of contact, who should seek advice from one of the individuals referenced above.

Company managers and supervisors are responsible for ensuring that this Code is understood and followed by their subordinates. Compliance with all laws, regulations, this Code, Company policies, and sound ethical practices will be taken into account when reviewing the performance of all employees. Failure to follow all laws, regulations, this Code, or applicable Company policies can subject an employee to discipline, up to and including termination of employment.

Aalyria may change, add or eliminate any policies or procedures contained in the Code at its sole discretion and at any time, unless prohibited by law. While it is hoped the Code will foster fair and consistent administration and concern for all employees, it does not create an employment contract between any employee and Aalyria. **All employees of Aalyria, regardless of their classification or position, are employed on an "at-will" basis.** No officer, agent, representative or employee of Aalyria, except its Chief Executive

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Officer, has any authority to enter into any agreement for employment for any specific period of time or to make any agreement contrary to this paragraph. In order to change the at-will nature of your employment, the Chief Executive Officer must do so expressly and in writing.

Lastly, this Code is not intended to be a complete discussion of all laws and regulations under which Aalyria and its employees and third parties operate. It is also not intended to account for all situations that an employee might face. It is the duty of each employee to seek out answers within the Company to any questions that they might have regarding ethical responsibilities.

### 1.1 **Our Mission**

Aalyria is creating, organizing and managing the world’s most advanced networks to enable connectivity everywhere at the speed of discovery.

### 1.2 **Our Vision**

Guided by integrity and a commitment to excellence and professionalism, we provide our global clients the most trusted source of support, training, logistics, and technology.

### 1.3 **Our Guiding Principles**

- **Integrity:** We demonstrate integrity in every aspect of what we do. We are committed to instilling professional and ethical behavior in all our employees, teammates, and associates.
- **Governance:** We take responsibility for our performance legally and ethically. We have a diverse Board of Directors that provides oversight and guidance to best serve our customers.
- **Excellence:** We set the bar for the best-in-class operational excellence. We empower our people to deliver customer-focused solutions with the highest levels of professionalism and commitment to excellence.
- **Dignity:** We honor the rights and beliefs of our fellow associates, our customers, our employees, and the communities in which we operate. We treat others with dignity and respect.
- **Teamwork:** We promote and support a diverse, yet unified, team. While respecting the

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individuality of our people, we work together as a team to meet our customers' goals.

- **Innovation:** We value, encourage, and enable our employees, teammates, and associates to develop innovative and pragmatic solutions to real-world challenges.

#### 1.4 General Policy

Aalyria is committed to complying with the letter and spirit of all laws, regulations, and contractual obligations to which the Company is subject. Furthermore, all business shall be conducted in a manner that evidences a strong commitment to the highest standards of ethics and integrity.

In adhering to this Code, employees must be cognizant of the applicable laws and regulations that apply to the Company's business affairs. Each employee has an obligation to familiarize themselves with the laws and regulations that are applicable to his or her job duties, and to always adhere to these requirements. When there is any question or uncertainty regarding these requirements, it is incumbent upon each employee to seek guidance from supervisors, managers, or the Chief Legal Officer or his designee.

#### 1.5 Ethical Decision Making

Although Aalyria believes that our employees will be guided to the right decisions by their own personal values, discretion, and good judgment, there are times when a situation may not be clear. It is not always easy to determine the ethical thing to do in a business situation.

As employees and representatives of Aalyria, we must always consider how our behavior and actions affect the integrity, credibility, and reputation of the Company as a whole.

If you encounter a situation and are not sure of the appropriate course of action, you should always discuss the issue with your supervisor, consult the Chief Legal Officer or his designee, or contact the Ethics Hotline at <https://www.lighthouse-services.com/aalyria> or call 833-203-6447. Reports made to the Ethics Hotline may be made anonymously.

When faced with an ethical dilemma, there are four basic questions that you should ask to assist in determining the correct course of action:

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1. **Define the problem:**

What feels wrong about this situation, behavior, or action? What is the issue about which you are unsure?

2. **Solution development:**

What are the solutions and resources available to solve the problem? Who should be involved in addressing the situation?

3. **Solution selection:**

What are the potential consequences? Which solution has the maximum benefit to all parties involved and causes the least harm? Does the solution comply with all applicable laws and Company policies?

4. **Implementation:**

How do I put the solution into action? Who should be consulted and informed of the solution?

Some other basic questions to ask yourself when making ethical decisions include the following:

- Is this situation/course of action against the law or Company policies?
- How will our customers, fellow employees, or community be affected?
- Am I being honest and impartial?
- Would I be comfortable describing my decision to my colleagues, Company management, and my family?
- How would it look if it made headlines?

### 1.6 **Reporting Violations of the Code**

Employees and applicable third parties with knowledge of a violation of this Code or the laws and regulations governing our business are expected to promptly report such violations to their manager, a Human Resources representative, the Chief Legal Officer or his or her designee, or via the Ethics Hotline at <https://www.lighthouse-services.com/aalyria> or call 833-203-6447.

If you have good reason to believe or suspect that a violation of the Code or the laws and regulations governing our business has occurred, or if you are asked to violate the Code or an

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applicable law or regulation, do not remain silent. Report such violations or suspected violations as soon as possible. Depending on the circumstances, failure to promptly report may itself violate this Code. Remember that no unethical or illegal acts can be justified by saying that they benefited the Company or were directed by a higher authority in the organization.

Any supervisor or other representative receiving a report concerning a known or suspected violation of an applicable law or this Code is expected to promptly report the matter to higher management and take such further action as may be directed.

The Ethics Hotline is available 24 hours per day, seven days per week for reports from employees, clients, and others involved with Aalyria. The Ethics Hotline provides an anonymous and confidential mechanism through which to report, for example, the following:

- Questionable accounting or auditing matters;
- Potentially illegal practices and/or dangerous situations;
- Unethical acts and/or potential violations of the Code or other Company policies;
- Violations of applicable laws or regulations;
- Fraud against clients, vendors, or employees of the Company.

In addition to reporting known or suspected violations, you are encouraged to contact the Chief Legal Officer or the Compliance Officer or her or his designee to discuss any ethics question or concern.

### **1.7 Non-Retaliation**

Enforcing this Code is impossible without the participation and support of all employees at all levels. Aalyria may not be aware of a serious breach of the Code unless employees fulfill their duty to bring such matters to the attention of management or the Chief Legal Officer, Compliance Officer or his designee. Retaliation by any employee against an individual who reports a violation of law or Company policy is strictly prohibited. No hardship, loss of benefit, or penalty—which may include downgrading an employee’s performance rating, limiting an employee’s opportunities for assignments or advancement, excluding an employee from corporate or departmental functions, or general mistreatment—may be imposed on an employee as punishment for filing or responding to a good faith complaint or cooperating in an investigation.

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It is contrary to Company policy for any person to request, pressure, or direct a Aalyria employee to act in violation of law, regulation, contract requirement, this Code, Company policy, or any other obligation. Any such request or direction should be brought to the immediate attention of management or the Chief Legal Officer, Compliance Officer or his designee.

### **1.8 Violation and Sanctions**

Any employee who violates an applicable law or any Company policies, including the Code, is subject to strict disciplinary action, which may include action up to and including termination of employment. Additionally, any employee who engages in reckless or malicious reporting, knowingly makes or refers a false allegation with knowledge that the incident reported has no factual basis, deliberately provides false information, or refuses to cooperate when subject to an investigation shall be subject to strict disciplinary action up to and including termination.

### **1.9 Accountability for Upholding the Code**

You are responsible for adherence to the standards of conduct set forth in this Code and for raising questions if you are concerned that these standards are not being met.

Company supervisors and managers must be particularly careful with their words and conduct to avoid placing, or seeming to place, pressure on subordinates that could cause them to perform in a way that is contrary to the ethical standards set forth in this Code and Company policies. If someone approaches you with a question or concern relating to the Code, listen carefully and ask for clarification and additional information to ensure that you fully understand the question or concern. Answer any question that you can, but do not feel that you must provide an immediate response. Seek help if necessary, before responding. If the concern raised requires that an investigation be conducted to determine whether a violation of an applicable law or the Code occurred, refer it to the appropriate resource identified in the section entitled, "Reporting Violations of the Code."

Any waiver, including implicit waiver or pre-approval, of one or more provisions of the Code must be reviewed and approved by the Chief Legal Officer or the Chief Executive Officer. This includes a conflict of interest or corporate opportunity, in any material respect, for the Chief Executive Officer or President, principal financial officer, principal accounting officer or controller, any other executive officer.

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## 2.0 **Creating a Safe and Secure Workplace for Aalyria Employees**

Aalyria is committed to providing a safe and respectful work environment free from threats, violence, harassment, and discrimination. Respecting others and performing with excellence create opportunities to achieve success in our workplace.

### 2.1 **Respect**

The Company is committed to the principle that all individuals should be treated with dignity and respect. Each employee of Aalyria is expected to treat his or her fellow colleagues, independent contractors, consultants, suppliers, and customers with dignity and respect at all times by refraining from abusive, hostile, or otherwise disrespectful behavior.

### 2.2 **Equal Employment Opportunity and Discrimination**

Aalyria is committed to providing equal employment opportunities to all applicants and employees in accordance with federal and state laws and sound employee relations practices. The Company hires only U.S. citizens and lawfully authorized foreign workers.

Each applicant and employee is considered on individual merit, without discrimination as to race, gender, age, national origin, religion, disability, sexual orientation, marital status, or veteran status.

Any employee who feels that he or she is a victim of any type of discrimination should immediately notify, the Chief Legal Officer or Compliance Officer, or <https://www.lighthouse-services.com/aalyria> or call 833-203-6447. All investigations will be conducted in a fair and discreet manner to ensure confidentiality to the fullest extent possible. Any employee, supervisor, or applicable third party who is found to have violated this policy will be subject to appropriate discipline, up to and including termination of employment.

### 2.3 **Harassment**

Consistent with our policy of equal employment opportunity, Aalyria strives to create and maintain a work environment in which people are treated with dignity, decency, and respect. The Company's work environment should be characterized by mutual trust and the absence of intimidation, oppression, and exploitation

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We will not tolerate discrimination or harassment of any kind, including as perpetrated through the use of Company equipment, including computers, fax machines, e-mail, and telephones.

All employees, regardless of their position, are covered by this policy and are expected to comply with it and take appropriate measures to ensure that prohibited conduct does not occur.

Harassment, including sexual harassment, is prohibited by federal and state laws. Aalyria prohibits harassment of any kind, and the Company will swiftly investigate and take appropriate action to address any violations of this policy.

Examples of harassment might include the following:

- **Verbal:** Comments regarding a person’s national origin, race, color, religion, age, gender, pregnancy, sexual orientation, disability, appearance, marital status or other protected status. Epithets, slurs, and/or negative stereotyping are all examples of verbal harassment.
- **Non-Verbal:** Distribution, display, or discussion of any written or graphic material that ridicules, degrades, insults, belittles, or shows hostility or aversion toward an individual or group because of national origin, race, color, religion, age, gender, pregnancy, sexual orientation, disability, appearance, marital status, or other protected status.

For further information about this topic, consult the Anti-Harassment Discrimination Policy.

## 2.4 Workplace Violence

Aalyria strives to create and maintain a work environment in which people feel secure. Any employee who commits or threatens to commit a violent act—such as fighting in the workplace or striking another employee—or attempts to bring a firearm or weapon to work shall be subject to disciplinary action up to and including termination of employment. Violence or a threat of violence committed during non-work times or off Company premises will likewise be subject to disciplinary action if the violence or threat of violence is determined to be workplace-related.

## 2.5 Safety

Aalyria is committed to supporting the safety, health, and well-being of our communities,

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our families, and our employees. Each of us is responsible for contributing to that goal. Every employee has a duty to comply with all health and safety rules and regulations to ensure the welfare of everyone at Aalyria. Any violations of health and safety rules and regulations, as well as accidents and injuries, should be promptly reported to the responsible manager.

## **2.6 Alcohol and Controlled Substances**

Aalyria is committed to providing a work environment free from illegal drugs and the influence of alcohol. Employees and other applicable third parties are prohibited from using illegal drugs or inhalants. Aalyria does not prohibit employees from the lawful possession of alcohol, subject to the following: (1) consumption of alcohol on Company premises or at Company sponsored-events must be approved by a member of the Executive Management Team; (2) employees are advised to exercise sound judgment and consume alcohol in moderation, and avoid operating a motor vehicle if such consumption impairs judgment or motor skills; (3) employees are accountable for their behavior if consuming alcohol on Company premises, at Company-sponsored events, at business functions, or on business-related travel.

Additionally, employees and applicable third parties may not be under the influence of legal drugs or inhalants prescribed by a physician if such use adversely affects the employee’s safety or the safety of others.

Employees on deployment are subject to additional guidelines and restrictions regarding alcohol and controlled substances. Please consult the applicable project policy or guidelines for further project guidance.

For further information about this topic, consult the Drug and Substance Abuse Policy and applicable contractual or program requirements.

## **2.7 Environment**

Aalyria is committed to environmentally sound business practices throughout the world. Employees are expected to perform their jobs in an environmentally responsible way and to report any potential environmental hazards immediately to management.

## **3.0 Integrity in the Workplace**

### **3.1 Political Contributions and Activities**

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Company funds and resources may not be used to contribute to or otherwise used to support any political campaign, political party, political candidate, or any of their affiliated organizations. In addition, corporate political contributions in certain states and countries are illegal or subject to monetary limitations and regulatory notification requirements.

Employees may voluntarily participate in the political process, but such activities must take place on the employee’s own time and at the employee’s own expense. Each employee is responsible for complying fully with all laws and regulations, including state and local laws, relating to political contributions and interactions with government officials. Employees may not engage in political activities that potentially conflict with their work duties and responsibilities to the Company, including by acting as an advisor to or spokesperson for candidates for public office. Employees shall not apply any pressure, direct or indirect, to other employees that infringes on an individual’s right to decide whether, to whom, and in what amount a personal political contribution is to be made.

### **3.2 Lobbying**

Lobbying activity is highly regulated. Lobbying includes attempts to influence Congress, congressional staff, and certain officers and employees of the Executive Branch regarding legislation, rules, regulations, programs, policies, and other similar actions. Lobbying activity can include phone calls, e-mails, letters, and in-person meetings. Aalyria employees must comply with all statutory and regulatory requirements, including state and local requirements, governing such activities, including registration, reporting, and disclosure requirements.

### **3.3 Solicitation**

Aalyria employees may not engage in solicitation, advertising, or distribution of leaflets, products, or brochures for personal interest or employee profit at work, on Company premises, or through use of Company resources, such as e-mail, computers or telephones.

Employees may ask fellow employees to support non-profit or charitable causes, as long as requests are

- Respectful toward other employees;
- Voluntary;
- Not for personal gain;

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- Do not interfere with job performance; and
- Are non-discriminatory and non-threatening.

Solicitation for personal interests or gain can make others uncomfortable and can be counterproductive to building trusted work relationships. Additionally, using Company resources for personal financial gain can limit the availability of those resources for business purposes and reflect negatively on Aalyria in the marketplace.

### **3.4 Theft**

Misappropriation, larceny, embezzlement, mischarging of time, and other forms of theft are strictly prohibited and are a violation of law. Any theft, regardless of relative value or damage to the Company, supplier, or customer, will result in severe consequences for the employee who engages in such behavior.

### **3.5 Unprofessional Behavior**

Company employees are expected to conduct themselves professionally and, in a manner, consistent with our values at all times. Unprofessional behavior or conduct that negatively affects the Company's business interests or reputation is prohibited.

### **3.6 Responding to Investigations or Legal Actions**

Damage to the Company's reputation may result when the Company is involved in an investigation or litigation. Employees are required to cooperate with internal investigations whether they are conducted by Company legal counsel or external counsel acting on behalf of the Company. Employees must never alter any documents or electronic records, lie to or mislead an investigator, or obstruct the collection of information relating to an investigation or any legal action brought against or on behalf of the Company.

Employees must notify the Chief Legal Officer or her or his designee immediately if they learn that any government agency or any third party is conducting an investigation or asking for information pertaining to a suspected violation of law. The Chief Legal Officer or his designee will review information before it is released to the investigative organization.

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## **4.0 Integrity in the Handling of Resources and Data**

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The Company's resources include time, material, facilities, equipment, information, and services. These resources should only be used for authorized business purposes, unless a specific exception has been approved by management. Under no circumstances should Company resources be used for any illicit or illegal purposes or for any purpose that runs contrary to any provision of this Code.

#### **4.1 Property**

Company-owned equipment, including telephones, and computers, are to be used primarily for business purposes. Although limited personal use of the Company's communications systems and equipment is permitted, users should not assume that any such communications are private. Employees may not use the Company's communication channels or access the internet at work to post, store, transmit, download, or distribute any threatening materials or to knowingly, recklessly, or maliciously transmit false materials, obscene materials, or anything constituting or encouraging the violation of any laws. The unauthorized removal or misuse of Company property may be considered theft.

#### **4.2 Accurate Records and Submissions**

Aalyria has a strict policy of complying with all record retention requirements imposed by laws and regulations. Employees must not improperly destroy, alter, make false entries on, or willfully fail to make correct entries on any Company documents or records. Company employees are also expected to ensure that any information provided internally or to outside parties is accurate and truthful. When Aalyria is asked to provide information to a government or other regulatory authority, inaccuracies or falsehoods could result in severe legal and financial consequences for the Company; therefore, extra care must be given to any statements, certifications, representations, and submissions made to a government, regulatory authority, or an employee or representative of a government or regulatory authority.

#### **4.3 Company Books, Records, and Reports**

All Company books and records must be maintained in accordance with generally accepted accounting practices and applicable laws and regulations. No false, misleading, inaccurate, or artificial entries may be made in the books and records of the Company. The Company maintains an effective internal control system to provide reasonable assurance that transactions are executed in accordance with proper management authorization and are properly reflected within the Company's financial

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records in accordance with U.S. and local statutory accounting principles.

#### **4.4 Accurate Time-Keeping and Other Records**

In reporting his or her time, each employee certifies how his or her time was spent on work-related activities. The accuracy of time records directly affects the accuracy of the data upon which the Company's billing systems depend. Improperly shifting costs from one contract or project to another, improperly charging labor or materials, and falsifying time-keeping or other records are strictly prohibited.

For further information about this topic, consult your company's or work location's relevant timekeeping policies and procedures.

#### **4.5 Protect Company Proprietary Information**

Information, knowledge, or know-how that gives a competitive advantage is considered intellectual property and is an asset. The Company's intellectual property must be used for authorized Company business purposes only. Employees must protect the Company's proprietary or private information, which may include, but is not limited to, technical designs or strategy, software, employee records, or information learned in a partnership or teaming arrangement. Employees should be especially cautious when providing such information to an outside entity and take proper steps to ensure that the receiving party will protect Aalyria proprietary information.

The Company's intellectual property, including data and information systems, customer lists, and other trade secrets, must remain with the Company when an employee leaves the Company. Use of the Company's intellectual property by a former employee may be a violation of law.

#### **4.6 External Public Communications**

To better serve our customers, and to protect the safety of our employees and operations, Aalyria requires that all Company employees refrain from making public statements about the Company or its operations, such as to the media or via blogs or social networking sites. In addition, certain customers specifically prohibit such communications under their agreements with the Company, and the Company includes restrictions on public disclosure in its agreements with employees. Therefore, employees should refer any media inquiries or other similar requests for information about the Company or its operations to the Company's media relations contact, and should not disclose such information via any other means (a blog, social networking site, published

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book or article, etc.).

#### **4.7 Protect Personal Information**

The Company is the custodian of personal data belonging to employees and others with whom we conduct business. To continue building and sustaining a culture of trust, we must protect personal data and use it only for authorized purposes. Personal data may only be collected if there is a specified, legitimate business purpose, and such data shall not be used in ways that are incompatible with the stated purpose. Data gathered must be relevant and not excessive in light of the purposes for which it is collected and used.

Employees who are granted access to Company-controlled personal data for legitimate business purposes must safeguard such data. Employees may not disclose such information without proper authorization and must never use personal information for any purpose for which it was not intended, including for personal gain.

Misuse of personal data could result in significant financial or social harm, including the following:

- Discrimination based on age, race, color, religion, national origin, gender, sexual orientation, physical or mental disability, veteran status, or other protected classes;
- Identify theft; and/or
- Access to money, goods, services, or any other thing of value.

Violation of the laws and regulations governing data privacy can result in fines and penalties to the Company and/or criminal prosecution of the individual who compromises the information.

#### **4.8 Protect Classified and National Security Information**

Due to the nature of our business, Company employees may be trusted with classified and national security information. All employees who are granted access to classified and national security information must take all necessary measures to protect such information and coordinate all activities related to this information with Security and Legal personnel who possess the appropriate clearances. Unauthorized access, dissemination, acceptance, or handling of classified information is strictly prohibited. Classified and national security information may not be disclosed to another person without the express approval from the appropriate U.S. government agency. Failure to

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properly protect classified information could result in harm to national security, fines and penalties, and/or suspension or debarment of Aalyria from receiving future contracts awarded by the U.S. government.

For further information about this topic, consult Technology Control Plan.

## 5.0 **Ethical Business Practices**

### 5.1 **Commitment to Quality**

It is the policy of Aalyria to provide the highest caliber of services and products to all customers, while remaining committed to respecting human rights and ethical and proper treatment of all employees and individuals affected by its operations.

Consistent with our commitment, company services must be provided in a manner that meets or exceeds requirements for safety, reliability, quality, and performance. To this end, all Aalyria employees should be dedicated to performing their job functions at the highest level of quality and contract conformance. Supervisors should provide opportunities for employees to receive training in quality assurance procedures and quality control measures. Furthermore, Aalyria employees shall be responsible for ensuring that services and products supplied by consultants, subcontractors, suppliers, and other entities doing business with Aalyria meet the Company's high level of quality expectations. Report any concerns regarding the quality of our services to your manager or the Quality Management Department.

### 5.2 **Fair Competition for Business Opportunities**

The Company's long-term success depends on upholding the integrity of the procurement process in bidding, negotiating, and performing contracts for local, state, national, and international customers. The Company competes fairly and ethically for all business opportunities. Employees involved in proposals, bid preparations, and contract negotiations must be certain that all statements, communications, and representations to prospective customers and suppliers are accurate and truthful. Once awarded, all contracts must be performed in a manner that meets or exceeds specifications, requirements, and clauses. Employees must refuse any offers to provide Aalyria with any unauthorized contractor bid and proposal information or source selection information and immediately report any such offer to the Chief Legal Officer or her or his designee.

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### 5.3 **Proper Exercise of Authority**

Employees must be aware of and operate in accordance with their authority limitations in authorizing and approving business transactions, such as purchasing materials, binding the Company in agreements, and authorizing expenditures. Specific guidance can be obtained from senior leaders, e.g., CEO, CFO, COO, SVP level leaders. This guidance must be followed to ensure appropriate review and approval of business transactions.

### 5.4 **Conflicts of Interest**

Aalyria recognizes an employee’s right to engage in outside financial business opportunities; however, any employment outside of Aalyria must be approved in advance by the Chief Legal Officer or his designee. In addition, any outside activities that result in a conflict of interest, diminished ability to perform Company duties, or the misuse of the Company’s name, image, assets, or resources are prohibited.

A conflict of interest may exist when an employee or a member of his or her family is involved in an activity or has a personal interest that could affect the employee’s objectivity in making a business decision. Outside activities that are illegal, interfere with an employee’s Company duties, or involve the misuse of the Company’s name, image, assets or resources are also considered conflicts of interest and are explicitly prohibited.

An actual conflict of interest does not need to exist to be a violation of this policy. Any activity that gives the appearance of a conflict of interest must also be avoided. Any outside activities that may give the appearance of a conflict of interest must be reported, and approval must be obtained before the employee or member of his/her family engages in the activity. Employees should contact the Chief Legal Officer or her or his designee for guidance.

The following list provides examples of activities that may create a conflict of interest, although it is not inclusive of all activities that may be a violation of this standard:

- Working or consulting for a competitor, supplier, or customer of the Company;
- Working for any business that affects your ability to satisfactorily perform your job duties for Aalyria;
- Having a financial interest (either by you or an immediate family member) in a Company competitor, supplier, or customer;

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- Participating in business opportunities between the Company and family members;
- Using confidential Company information, such as knowledge of pending contracts, acquisitions, divestitures, or supplier relations, for personal gain or for the gain of another; or
- Receiving discounts or other benefits from suppliers or customers that are not available to all employees.

Each Aalyria employee is required to report potential conflicts of interest or other ethically questionable behavior to the Chief Legal Officer or his designee. Failure to report conflicts of interest or ethically questionable behavior may result in Aalyria taking disciplinary action up to and including termination of employment.

#### **5.5 Marketing and Advertising Materials**

In preparing and using Aalyria marketing and advertising materials, we must ensure that (1) no false or misleading statements are used; (2) all Company proprietary data are properly marked with the appropriate legends; (3) information or photos that identify clients or programs are used correctly and with the express permission of the client or program manager; and (4) trademarks of another company are used correctly and with appropriate authorization, and their owners are given proper attribution. All disclosures made in materials released to the public must be current, accurate, complete, and timely.

#### **5.6 Suppliers and Contractors**

Aalyria shall engage in business with suppliers that have exhibited high standards of ethics and business integrity and have demonstrated compliance with all applicable laws and regulations. The way Aalyria selects suppliers requires the utmost care and due diligence. The character of the suppliers that we select is highly reflective of the way that we conduct business. Additionally, U.S. federal law requires that certain government acquisition rules related to ethics and business conduct are passed down to subcontractors. The Company must exercise continuous and diligent oversight of the operations and practices of the suppliers and subcontractors that we select. Suppliers and subcontractors shall be held responsible for delivering quality services and materials, meeting contractual requirements, operating with ethical business principles, and complying with applicable laws and regulations.

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## 5.7 Retention of Consultants

Aalyria only works with those consultants, business representatives, and other third parties who share a commitment to upholding the highest standards of ethics and business integrity. The actions of consultants, business representatives, and other third parties reflect on and impact the reputation of Aalyria. Business integrity and commitment to compliance with applicable laws and regulations are key considerations in the selection and retention of those who represent Aalyria. Employees should be mindful to inform any consultants of all applicable laws and regulations to which their conduct should adhere. The Company can be held accountable for the acts of its agents and, therefore, has exposure to penalties and sanctions for illegal acts of consultants, business representatives, and other third parties providing services to, and acting on behalf of, the Company. Employees must not retain consultants, business 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 information or influence.

## 5.8 Offering Business Courtesies

Business courtesies, such as gifts, entertainment, services, or favors (collectively, a “gift”), offered to commercial, non-governmental customers, or other business associates should be infrequent and nominal, appropriate under the circumstances, legal, and offered in a way that does not create the appearance of impropriety. In determining whether a gift may be appropriate, remember that an employee should never give a gift for the purpose of persuading an individual to take action in favor of Aalyria. For further information about this topic, consult the Aalyria Anti-Corruption Policy.

If there are any doubts regarding the propriety of a gift, employees must obtain advice from the Chief Legal Officer or her or his designee regarding the appropriateness of the gift prior to giving it.

## 5.9 Receipt of Business Gifts

Aalyria employees must report all business gifts, other than promotional items of nominal value (less than \$20), such as coffee mugs, calendars, and pens, to the Chief Legal Officer or his designee for disposition. The Chief Legal Officer or his designee will determine the proper gift disposition based on the business relationship the Aalyria employee has with the source of the gift and the gift’s dollar value. This requirement also applies to immediate family members of an employee if a gift is received at home.

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Attendance at business dinners and other widely attended events where business courtesies are extended that exceed the \$20.00 nominal value are an exception to the rule on reporting business gifts at Aalyria. If you have questions concerning meals and entertainment, contact the Chief Legal Officer or his designee, as in some circumstances such entertainment may create the appearance of or an actual conflict of interest. Additional guidance on gifts and the related problem of kickbacks is provided at paragraphs 5.10 – 5.12 below.

**5.10 Acceptance of Gifts by Aalyria Employees Who Procure Goods or Services**

Employees who purchase goods or services for Aalyria or are involved in the procurement process must treat all suppliers uniformly and fairly. In deciding among competing suppliers, employees must objectively and impartially weigh all facts and avoid even the appearance of favoritism.

**5.11 Acceptance of Gifts by Aalyria Employees in Non-Procurement Functions**

Although employees may not use their position at Aalyria to obtain business courtesies, employees not involved in purchasing of goods and services may accept appropriate meals, hospitality, and entertainment, provided that these courtesies further legitimate Company business interests (such as relationship building with actual or potential business partners) and that

- The acceptance will promote goodwill and successful business relations;
- The courtesies are not lavish or extravagant under the circumstances;
- The courtesies are not frequent and do not reflect a pattern or the appearance of a pattern of frequent acceptance of courtesies from the same entities or persons; and
- You would feel comfortable discussing the courtesies with your manager or a coworker, or having the courtesies disclosed to the public.

If there are any questions about the propriety of accepting a business courtesy, contact your supervisor or the Chief Legal Officer or her or his designee for guidance. An employee should never accept a gift of greater than nominal value if it could appear that his or her judgment might not be objective as a result of that gift. 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.

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### 5.12 **Kickbacks**

Solicitation of business courtesies is always prohibited. Aalyria employees shall not seek or accept any payment, gift, or other thing of value from current or potential subcontractors, suppliers, customers, or business partners for the purpose of obtaining or acknowledging favorable treatment under a contract or subcontract of any kind. To do so constitutes a “kickback” and is a crime. Employees who have knowledge or information regarding potential kickback violations must report them immediately to the Chief Legal Officer or her or his designee or through the Ethics Hotline at <https://www.lighthouse-services.com/aalyria> or call 833-203-6447 . Reports made to the Ethics Hotline may be made anonymously.

### 5.13 **Antitrust and Competition**

It is the Company’s intention and good business to obey the antitrust and competition laws of every country in which the Company does business. The following conduct could violate antitrust laws and is highly problematic:

- Fixing prices, agreeing with a competitor on prices, or setting prices in concert with a competitor;
- Bid rigging or agreeing with a competitor to set the terms or direct the outcome of a bidding process;
- Boycotting suppliers or customers to coerce the suppliers or customers to stop dealing with a competitor;
- Pricing intended to drive competitors out of business;
- Disparaging, misrepresenting, or harassing a competitor;
- Engaging in bribery, accepting kickbacks, or stealing trade secrets;
- Entering into agreements or understandings with competitors to divide the market in which they compete by allocating territories or markets and/or limiting the production or sale of products or product lines;
- Conditioning the sale of one product/service on the sale of another unwanted

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product/service;

- Conditioning the sale or purchase of products/services on the requirement that the seller or purchaser not do business with competitors of the Company.

Employees will avoid engaging in or discussing any of the above activities with competitors, suppliers, or customers and must report any instance in which such activities are proposed or discussed to the Chief Legal Officer or his designee.

Unfair methods of competition are also prohibited, including engaging in industrial espionage, inducing a competitor’s customer to breach a contract, paying bribes, making false or disparaging comments regarding a competitor’s product, and making misleading advertising claims. Proposed contracts or other restrictive agreements with suppliers and customers that may be perceived to involve exclusive dealing must receive the approval of the Chief Legal Officer or her or his designee prior to engagement.

#### **5.14 Insider Trading**

During the course of their employment at Aalyria, employees and other applicable third parties may become aware of “material insider information,” which is material information that is not publicly available and could lead a reasonable person to buy, sell, or otherwise trade in stocks or securities. Examples of material insider information include contract awards, contract cancellations, acquisitions or divestitures of corporate affiliates, and the hiring or termination of key employees.

Company employees and applicable third parties are prohibited from trading stock of any company— such as a customer, supplier, competitor, potential acquisition target, teaming partner, or alliance— while in possession of material insider information about that company. Insider trading is illegal and consequences of insider trading can be severe, including loss of employment, substantial fines, and imprisonment.

#### **6.0 Ethical Business with the United States Government – Special Guidelines**

Doing business with the U.S. government is both an honor and a privilege. Employees should be aware that the U.S. government imposes significant rules and regulations on companies with which it does business and that these rules and regulations can differ substantially from those the Company operates under when it sells to a purely commercial customer or to foreign governments. It is the duty of Aalyria employees to become knowledgeable about these special U.S. rules and regulations and to comply with them.

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**6.1 Recognizing When These Special Guidelines Apply**

Aalyria may contract directly with the U.S. government or as a subcontractor to a prime contractor that is performing a contract for the U.S. government. As such, even if the Company does not hold a contract directly with the government, many of the special rules may nonetheless apply to Aalyria because the U.S. government ultimately pays for the Company’s services. In addition, there are rules that apply to the Company’s relationships with third parties, such as teaming partners, vendors, and suppliers, that are working to meet the U.S. government’s needs and requirements.

**6.2 Procurement Integrity**

During a U.S. government competitive procurement process, certain types of information may not be requested or obtained by the Company from anyone unless the information is obtained through public resources that are available to everyone. In addition, requesting or obtaining certain other information about the Company’s competitors is prohibited. Prohibited materials includes (1) the Government’s source selection plans, (2) technical, cost or price evaluations of proposals, (3) competitive range determinations, (4) rankings of bids, proposals or competitors, (5) source selection reports or evaluation, (6) cost or pricing data, (7) indirect costs and labor rates, (8) proprietary information about a competitor’s manufacturing processes, operations or techniques, or trade secrets, (9) information marked by an offeror or contractor as “contractor bid or proposal information,” or (10) any other information marked as “Source Selection Information” in accordance with FAR 3.104

If you receive information that you are not sure that Aalyria should have pertaining to a federal agency procurement or to a competitor, you should immediately contact the Chief Legal Officer or his designee before reviewing or sharing the information with anyone inside or outside the Company.

**6.3 Truth in Negotiations and Proposals**

When conducting business with the U.S. government, the Company is obligated to comply with the Truth in Negotiations Act (“TINA”). When TINA is applicable, employees and applicable third parties are expected to ensure that the Company provides accurate, complete, and current cost or pricing data to the government or a prime contractor when the Company is a subcontractor to that prime government contractor.

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#### **6.4 U.S. Government Property**

The Company is required to establish and maintain a system in accordance with U.S. government requirements to control, protect, preserve, and maintain all U.S. government property that is under the Company's control. Aalyria employees must be able to identify such property and track it through the Company's property records. Damage to or misappropriation of U.S. government property can result in breach of contract charges or even imposition of civil penalties and criminal charges. In the event that damage occurs to U.S. government property, it should be immediately documented and reported to management.

For further information about this topic, consult your company's or work location's specific property management policies and procedures.

#### **6.5 Contract Certifications and Representations**

The U.S. government requires contractors to make certain written representations and certifications in order to ensure that prospective contractors meet the qualifications of contract solicitations. During contract performance, there are a host of written attestations that a contractor such as Aalyria is required to make, including conformance reports, time and material records, and other documents supporting our invoices for payment. It is imperative that all representations and certifications be complete and accurate. Employees must consult with Contracts or the Chief Legal Officer or her or his designee when preparing representations or certifications to ensure completeness and accuracy.

#### **6.6 Purchasing and Subcontracting**

Because the value of subcontracts and purchase orders awarded by a U.S. government contractor can be substantial, the U.S. government has a strong interest in, and exercises great control over, a contractor's subcontracting process. Among other things, U.S. government requirements can affect the types of subcontracts used, the amount and type of competition used, and the terms and conditions that are required to be included in vendor agreements and subcontracts. It is Company policy to comply with all such restrictions.

#### **6.7 Contract Costs**

Only costs properly chargeable to a contract may be billed to or reimbursed by the U.S. government. Intentionally overbilling the Company's customers is strictly prohibited. Cost and pricing information must be current, accurate, and complete. Billing of charges must be accurate and strictly

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limited to allowable costs in accordance with the Federal Acquisition Regulation. Improper charging of costs may arise from various causes, including false or otherwise incorrect entries on time cards, subcontractor charges, classification of costs between direct and indirect categories, expense accounts, or charges of time or materials to a work order or other cost account.

### **6.8 Performance Obligations**

During the course of contract performance, government contractors must meet numerous obligations unique to U.S. government contracting, including strict compliance with the terms of the contract, as well as strict adherence to specifications, delivery schedules, milestones, and other performance commitments. Indeed, when the Company submits an invoice for payment or signs a certification of conformance, it is certifying that it has met all contract obligations, no matter how seemingly insignificant. Therefore, employees should consult with Contracts and/or management to ensure that all contractual obligations have been met prior to seeking payment from a customer. Program management must ensure that all deviations from the letter of the contract are approved by the Government Contracting Officer in writing.

### **6.9 False Claims and False Statements**

The submission of false claims and the making of false statements to the government is strictly prohibited by U.S. law and subjects the originator to criminal and civil sanctions.

### **6.10 Reporting Obligations**

The Company has certain self-disclosure requirements to the U.S. Federal Government when there is credible evidence of a violation of Federal criminal law involving fraud, conflict of interest, bribery, or gratuity, or a violation of the Civil False Claims Act in connection with Government contracts. These disclosure requirements for individual contracts continue until at least three years after final payment on the contract. Any employee with knowledge of any suspected or actual failure to meet this disclosure requirement must provide immediate notice to the Chief Legal Officer.

### **6.11 Government Audits**

Aalyria employees and applicable third parties shall cooperate with designated officials of the U.S. government and other countries' governments to facilitate timely and efficient performance of audits and examinations required under a contract. All records and data must be internally approved prior to release.

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#### **6.12 Offering Gifts and Gratuities**

There are constraints on the Company’s ability to offer or accept business courtesies in connection with potential U.S. government customers. No employee or applicable third party may offer or pay anything of value to any official or employee of any U.S. government agency, political party, or candidate for public office in an attempt to improperly influence any act or decision of such official, employee, or candidate for the purpose of promoting the business interests of Aalyria.

Gifts of nominal value may be given, so long as they are consistent with 5 U.S.C. § 7353: Gifts to Federal Employees.

For further information about this topic, please contact the Legal Department.

#### **6.13 Hiring Former and Current Government Employees**

Numerous laws restrict the timing of employment discussions between U.S. government employees and contractors. There also are post-employment “revolving door” restrictions that limit the types of activities that certain former government employees can perform in the private sector. In absolutely no case should the promise of employment be made to a government employee in order to gain a competitive advantage or obtain something of value from the government. Never hold employment discussions with government employees who are responsible for approving the Company’s work or invoices for payment. Holding employment discussions with government employees must be pre-approved by the Chief Legal Officer.

#### **6.14 Penalties and Sanctions**

The U.S. government has a long list of legal sanctions and penalties available for violations of the requirements imposed by law, regulation, and contract. The consequences of running afoul of the government contracting rules range from criminal fines and imprisonment to civil fines, exclusion from the procurement process, contract cancellation or termination, and suspension or debarment of Aalyria from receiving future contracts awarded by the U.S. government. These penalties and sanctions apply with equal force to Aalyria as an entity and to those employees, affiliates, and third parties involved in the improper activity.

#### **6.15 Communication with Government Agencies**

As part of the Company’s reporting obligations and cooperation with government agencies,

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various members of the Company may be asked to communicate directly with government officials conducting inquiries, audits or investigations. This request may be from the Company, or it may be from the government agency itself. All communications with government officials must be truthful and accurate. Care also must be taken not to speculate or to guess or assume facts that are beyond the employee’s knowledge, because these can lead to miscommunications or misstatements that can complicate the Company’s effort to cooperate. If an employee is not able to accurately provide information, the question should be directed to their supervisor or to Company management for response. Employees also should inform their supervisor or Company management of discussions with government officials conducting such inquiries so that the Company is prepared to support and/or respond to such inquiries.

#### **6.16 Record Retention**

Certain documents and other records pertaining to our business must be maintained for specific periods of time for possible review by regulatory authorities. When a Government prime contract or subcontract is involved, records generally must be retained for three years after final payment. In addition, there may be other retention requirements imposed by contract or by law. The Company has a Document Retention Policy that specifies the retention practices for Company records and documents. The Company will comply fully with all record retention requirements imposed by the Government.

### **7.0 Ethical Business in the Global Market**

It is imperative that Aalyria employees understand and abide by the applicable laws of the countries in which we conduct business. Compliance with applicable laws reflects the Company’s commitment to conduct business with the highest level of integrity and is critical to building and maintaining the reputation for excellence.

#### **7.1 Anti-Corruption Policy**

Aalyria is committed to conducting business ethically around the world. It is strictly against Company policy to engage in or tolerate bribery or any other form of corruption. Broadly speaking, the Company prohibits any payment or offer or promise of payment that would violate the U.S. Foreign Corrupt Practices Act (“FCPA”) or any law of a country where the Company operates. Compliance with the FCPA and other anti-corruption laws is an important element in the Company’s mission to support U.S. national security and foreign policy interests. It is Company policy to compete on the merits of our performance, reputation, and the value that we offer.

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## 7.2 **Anti-Bribery**

Many countries, including the United States and the United Kingdom, have passed legislation criminalizing bribery of foreign government officials. A bribe or kick-back is giving or offering to give anything of value to a foreign government official (including but not limited to employees of government-owned or controlled businesses, employees of public international organizations such as the World Health Organization, and candidates for political office) in order to obtain or retain business, or secure an improper business advantage.

Moreover, the company and its employees can be held liable for bribes paid by a third-party or agent or consultant acting on behalf of the company. A company or individual can also violate certain anti-corruption laws if improper payments are made by an agent or other third party if you have a “firm belief” that the payment will be passed on to the official, or you have “knowledge” of misconduct. Sticking one’s head in the sand, or looking the other way will not protect the company or individuals from violating the law.

The sanctions for violation of these laws can be severe, including significant individual and corporate fines, and even imprisonment. It is company policy to ensure that nothing of value, including extravagant entertainment or gifts, is provided, directly or indirectly through a third party, to any person or is requested or solicited from another person for the purpose of obtaining or retaining business or otherwise gaining an improper business advantage. In short, we as a company should always conduct our business with the utmost integrity.

Laws that govern the company’s international business activities require that the company’s books and records be complete and accurate. Employees must comply with requirements elsewhere in this Policy concerning record-keeping obligations.

Each employee, officer, director, and any third party acting on the Company’s behalf or on behalf of its affiliates must comply with the FCPA at all times and seek guidance or assistance if there is any doubt about whether a course of action might violate the FCPA. No employee or applicable third party may offer, promise, or give, directly or indirectly, money or any other thing of value to any foreign government official with the intent to cause that official to take favorable (or not to take unfavorable) action in order to obtain or retain business for the Company or for any other company or person or to obtain any other improper advantage. If you are uncertain regarding the acceptability of a business courtesy, consult with the Chief Legal Officer or her or his designee.

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In furtherance of its compliance efforts, the Company has developed a rigorous due diligence process applicable to prospective third parties. In addition, appropriate anti-corruption compliance and/or certification provisions are included in the Company’s written agreements with third parties.

Each employee has the responsibility to report violations, potential future violations, or suspected violations of the FCPA or other anti-corruption laws through their chain of command, to the Chief Legal Officer or her or his designee, or through the Ethics Hotline at <https://www.lighthouse-services.com/aalyria> or call 833-203-6447 As noted above, the Company has a “Zero Tolerance” policy for violations.

Refer to the Company’s Anti-Corruption Policy for specific guidance about payments to government officials, exceptions to relevant anti-corruption laws, and engaging third parties.

### **7.3 Export and Import Compliance**

The United States and many other countries have export/import control laws governing strategically necessary technologies and products. Violations of these laws can harm U.S. national security and undermine foreign policy. Penalties for violations for both Aalyria and the individuals involved are severe and can include monetary penalties, imprisonment, and suspension of export/import and government contracting privileges. All Aalyria employees must abide by all applicable U.S. export, import, and re-export laws and regulations. Any required authorizations must be obtained prior to exporting, importing, or re-exporting controlled goods, technology, or services.

When seeking an import or export authorization, early coordination with the relevant Empowered Official and the Chief Legal Officer or her or his designee is critical. The applicable regulatory regime depends on the type of goods, technology, or services being exported or imported and the intended destination. Some of the major U.S. export/ import control laws to which Aalyria is subject are the following:

- **International Traffic in Arms Regulations (“ITAR”).** The ITAR, administered by the U.S. Department of State in furtherance of the Arms Export Control Act, controls exports and temporary imports of defense articles and services. Such products and services are identified on the U.S. Munitions List contained in the ITAR and include items “specifically designed or modified for military purposes.” The ITAR also contains the requirements for export licenses and other approvals for permanent export, temporary export, or temporary import transactions.

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- **Export Administration Regulations (“EAR”).** The EAR, administered by the U.S. Department of Commerce, controls exports of commercial and “dual-use” commodities and technology. Dual-use items are products, software, and technical data developed for civil applications, but which can be used militarily without further modification. Items requiring export licenses appear on the Commerce Control List (“CCL”) contained in the EAR. Items on the CCL are subject to U.S. export control whether they are exported from the United States or are re-exported from one non-U.S. country to another.

For purposes of both the ITAR and the EAR, engaging in discussions of controlled technology or technical data with foreign persons in the United States constitutes an export.

- **Foreign Assets Controls.** To comply with the Trading with the Enemy Act and the International Emergency Economic Powers Act, and, in some cases, to comply with sanctions imposed by the United Nations, the United States imposes economic sanctions and embargoes on certain countries, individuals, and entities. The U.S. Department of Treasury’s Office of Foreign Assets Control (“OFAC”) administers regulations that can involve blocking property, prohibiting exports and re-exports, and restricting other activities with respect to those countries. OFAC also maintains a list of “Specially Designated” nationals, or individuals and entities subject to restrictions under the regulations.

Aalyria employees shall not make export, import, and re-export decisions on their own. All such decisions shall be made by the Trade Compliance Officer and/or the Chief Legal Officer or his designee dedicated to the review of applicable laws and regulations and determination of appropriate U.S. government authorizations.

It is the responsibility of Aalyria employees to report suspected non-compliance or suspicions of unauthorized exports, imports, or re-exports.

If any Aalyria employee knows or reasonably suspects that unauthorized transfers of technical data, training, or defense services are being conducted, it is his or her responsibility to notify his or her program management, the Trade Compliance Officer, the Chief Legal Officer or his designee, or the Ethics Hotline at <https://www.lighthouse-services.com/aalyria> or by phone at **833-203-6447**. Reports made to the Ethics Hotline may be made anonymously.

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#### 7.4 **Anti-Boycott**

Aalyria employees may not enter into an agreement, provide any information, or take any action that would cause the Company to refuse to deal with potential or actual customers, suppliers, or others in support of an illegal boycott or to engage in or support restrictive international trade practices or boycotts not sanctioned by the U.S. Government. All requests to engage in any such activity must be immediately reported to the Trade Compliance Officer and/or the Chief Legal Officer or his designee.

#### 7.5 **Commitment to End Human Trafficking**

Human trafficking is slavery that forces individuals into labor or sexual servitude. As an international company, Aalyria is committed to the eradication of human trafficking. The Victims of Trafficking and Violence Protection Act of 2000 prohibits all human trafficking and provides for severe penalties, including fines and up to life imprisonment. The statute also permits federal prosecution where the victim's service was compelled by confiscation of documents, such as passports or birth certificates. Accordingly, similar to the U.S. Government, Aalyria has adopted a "zero tolerance" policy for trafficking in humans and will not tolerate the practice in any form, as prohibited by U.S. federal and international laws and regulations. Any employee or third party acting on behalf of the Company who directly or indirectly engages in human trafficking will be immediately terminated, and their actions will be reported to the appropriate authorities for prosecution. Aalyria is obligated to notify the Government Contracting Officer of any violations and corrective actions taken. Any actions by subcontractors that appear to violate these provisions, including service compelled by the confiscation of documents, should be immediately reported to program management or the Chief Legal Officer or her or his designee.

#### 8.0 **Dissemination and Review of the Code**

Aalyria distributes this Code to all of its employees and employees of its affiliates and applicable third parties. This distribution is supplemented with appropriate training on ethics and compliance. New employees receive a copy of the Code during their orientation and are required to familiarize themselves with it. Agents, representatives, and consultants working for, or on behalf of, Aalyria are bound by the Code.

Each individual or entity receiving this Code is responsible for reading and understanding its contents; any questions or clarifications should be addressed to managers, supervisors, or the Chief Legal Officer or her or his designee. Each individual or entity is also responsible for affirming compliance with the

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Code by signing the Attestation or Certification of Compliance with the Code of Business Ethics and Conduct, a sample of which is attached here.

This Code is a statement of the Company’s ongoing commitment to ethical behavior, and Aalyria may make periodic changes to the Code, as requirements dictate. Employees will be responsible for complying with all such changes. Suggestions for improvement should be directed to the Chief Legal Officer or her or his designee.

**9.0 Ethics and Compliance Training**

Aalyria expects all employees and the Board of Directors to participate in regular ethics and compliance training. Employees are required to complete Ethics Awareness Training annually and compliance training as assigned. Completion of annual Ethics Awareness Training and Business Conduct Compliance Training is a condition of continued employment with Aalyria. Employees who fail to complete assigned training in a timely manner will be subject to discipline, up to and including termination of employment.

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**EMPLOYEE’S (AND PROSPECTIVE EMPLOYEE’S) ATTESTATION OF COMPLIANCE WITH THE CODE OF BUSINESS ETHICS AND CONDUCT**

As set forth in its Code of Business Ethics and Conduct, Aalyria is committed to the highest standards of integrity, ethical behavior, and compliance with all applicable laws. As an employee (or prospective employee) of Aalyria, I support these objectives and affirm the following:

I have read and understand the Code of Business Ethics and Conduct. I understand that the Code sets forth the minimum standards of conduct with which I must comply.

I am personally responsible for complying with all sections of the Code of Business Ethics and Conduct and acting ethically and with integrity at all times.

I will be held accountable for my actions, and any violations of the Code of Business Ethics and Conduct may result in disciplinary action, up to and including termination.

It is my duty and responsibility to report any known or reasonably suspected violations of the Code of Business Ethics and Conduct or Aalyria policies. I may report such violations to my manager, Human Resources, Security, the Chief Legal Officer or his designee, or the Ethics Hotline, and I may do so anonymously.

It is my responsibility to understand the Code of Business Ethics and Conduct, and I should direct any questions to my manager or the Chief Legal Officer or her or his designee.

I also attest that nothing in my past or present conduct contradicts the Code of Business Ethics and Conduct, Statement of Conformance.

# Aalyria

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\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Print Name

\_\_\_\_\_  
Title and Company Name

This attestation must be completed and returned to your manager, Human Resources, or the Chief Legal Officer or her or his designee for retention with your personnel records. Failure to do so may result in disciplinary action, up to and including termination, or failure to receive an offer of employment.