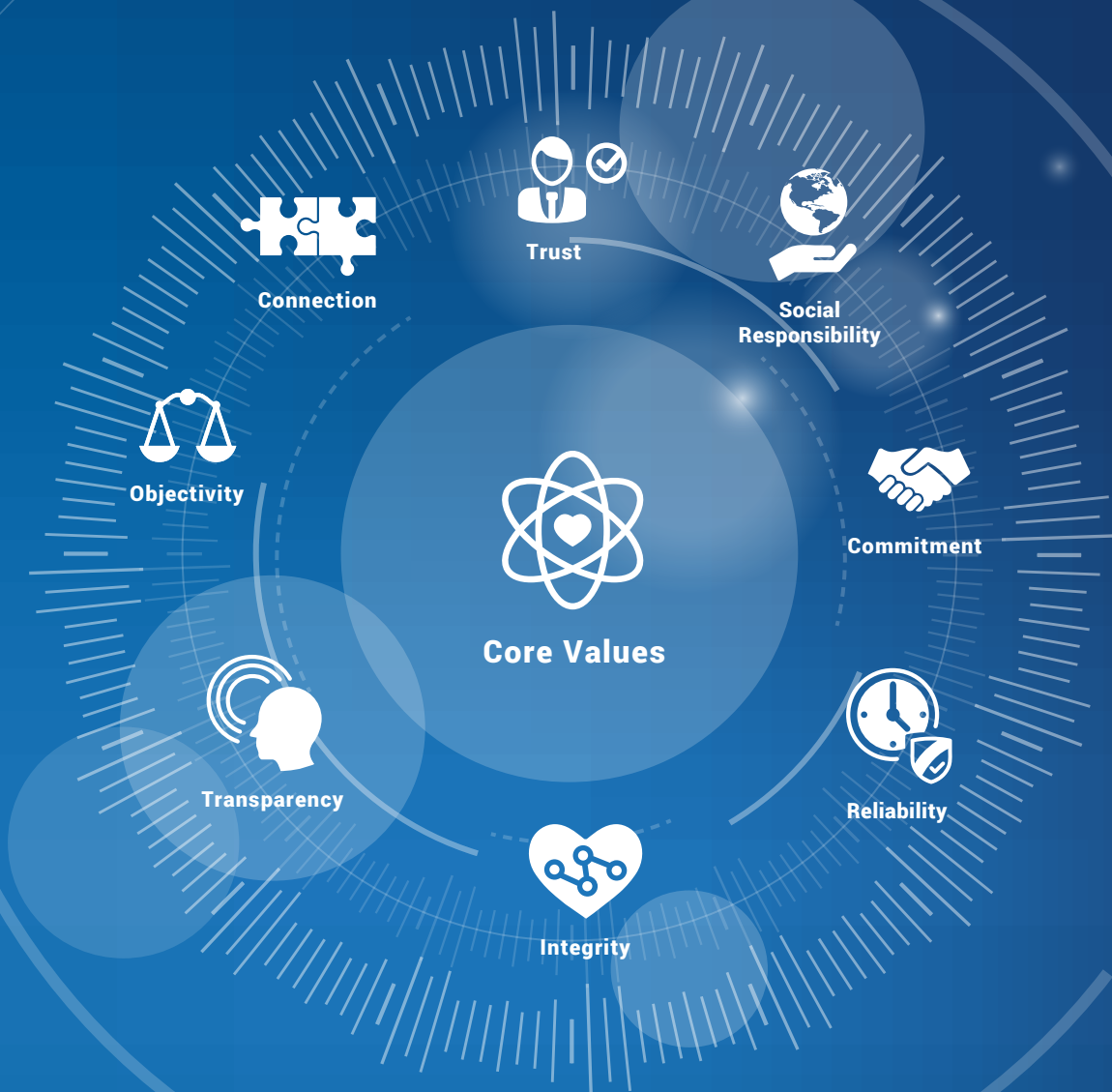




Code of Ethics



Since 1961, our commitment to ethical conduct and our dedication to client service have made LMI one of the most trusted names in government consulting. Our values of integrity, honor, and treating everyone with respect and dignity are not just at the core of our business—they're at the core of who we are.

Our Code of Ethics embodies our commitment to doing the right thing for the right reasons. It is more than a collection of abstract principles. This Code sets standards for how we conduct business and treat each other. It defines how we seek new business, interact with customers, hire subcontractors and vendors, and work together.

This Code also describes the potential serious consequences of not following our rules. No one is exempt, and LMI will not tolerate conduct from anyone who violates our standards. If you witness behavior that is inconsistent with our Code, we expect you to say something. Raise your concerns to your supervisor, the Chief Performance Officer, the Law department, or any member of senior leadership. You can also report violations through the LMI Hotline, available 24 hours a day, 7 days a week, by phone (844.627.6599), or visit lmi.ethicspoint.com. We strictly prohibit retaliation, so no one who raises concerns in good faith need ever fear reprisal for speaking up.

Our reputation is one of our most valuable assets, and it is through your actions that we protect it. We ask that you join us in committing to applying these standards and our shared values in all that you do. Thank you for your dedication to upholding LMI's commitment to uncompromising integrity and for always striving to do what is right for our clients, our teammates, and the country and people we have the honor to serve.

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Gifts, Gratuities, Kickbacks, and Post-Government Employment

Gifts and Gratuities

LMI's purchases of supplies and services from suppliers and subcontractors must result in fair prices, high quality, and excellent performance, and must be accomplished in a manner that preserves procurement integrity. We don't seek an improper advantage by offering gifts, gratuities, or business courtesies—such as entertainment, meals, transportation, or lodging—to our clients, suppliers, or subcontractors.

Because giving gifts or gratuities presents a minefield of potential conflicts of interest and violations of government and other regulations, LMI has adopted a strict policy of never giving gifts, gratuities, or business courtesies to any government employees, public officials, or contractors or representatives of public agencies. Please refer to the Meal and Beverage Policy. For the same reason, LMI employees may not accept gifts, gratuities, or business courtesies from subcontractors. Similarly, LMI employees may not accept gifts, gratuities, or business courtesies from suppliers or vendors that could influence the employee or result in unfair dealings or the perception of unfair dealings.

Employees must follow established routines and procedures in the procurement of all goods and services as set out in LMI's Procurement Manual. It may be permissible to accept modest, unsolicited meals, refreshments, entertainment, and other business courtesies on occasion so long as it could not be reasonably construed in any way as an attempt by the offering party to secure favorable treatment. When in doubt, LMI employees shall request approval of such business courtesies from LMI's Law department.

Improper Payments and Bribery

LMI has zero tolerance for bribery, kickbacks, and other improper payments. We succeed on the strength and quality of our services and not on improper payments to obtain or retain business or to secure an improper advantage. We never make or take bribes or kickbacks to or from anyone.

Anti-bribery laws in the United States and other countries in which LMI does business prohibit anyone from giving a bribe for the purpose of improperly influencing an official act or to obtain favorable treatment. Bribes can include anything of value:

- Cash or cash equivalents (like gift cards), credits, and discounts
- Kickbacks
- Gifts
- Hospitality, job offers, and personal favors
- Favorable loans and debt forgiveness
- Political contributions and charitable donations.

A number of laws prohibit giving or offering bribes to public officials and make it a crime for a public official to ask for or accept a bribe. LMI employees must avoid any action that creates even the appearance of violating these laws. Please review the Anti-Bribery and Foreign Corrupt Practices Act Policy for more details.

Kickbacks

The Anti-Kickback Act of 1986 prohibits prime contractors and subcontractors from offering, soliciting, providing, or accepting anything of value to obtain or reward favorable treatment in connection with the award or performance of U.S. government prime contracts and subcontracts.

The concept of “favorable treatment” includes

- disclosing or receiving confidential information related to competitor bids,
- knowingly accepting or providing inferior products that do not meet contract specifications,
- adding or recovering improper or unallowable expenses, and
- improperly awarding a subcontract or orders under a subcontract.

LMI has an affirmative obligation to report Anti-Kickback Act violations to the government. If an LMI employee believes or suspects that a violation has occurred, the employee must immediately contact LMI's Chief Performance Officer, Law department, or the LMI Hotline by phone (844.627.6599) or visit lmi.ethicspoint.com.

Employment Discussions and Post-Government Employment

Current and former U.S. government employees, including military officers, are subject to federal conflict of interest laws and regulations that may limit the ability of LMI to recruit and hire these individuals, and may limit the activities they will be able to perform for LMI, if hired. LMI is committed to complying with all applicable post-government employment ethics rules and regulations. These rules are complex, so anyone wanting to begin discussions with current U.S. government employees and military officers must first consult with the Human Resources and the Law departments.

Procurement Integrity

LMI abides by the principles of integrity in the government marketplace. Accordingly, we will neither solicit nor accept sensitive or proprietary government information before it is available through normal processes. An LMI employee must not provide or accept nonpublic information related to any procurement from any source if he or she has a reason to believe that the release of the information was unauthorized. LMI employees must immediately report any known or suspected unauthorized release or receipt of nonpublic information to LMI's Chief Performance Officer, Law department, or the LMI Hotline by phone (844.627.6599) or visit lmi.ethicspoint.com



Competitor and Source Selection Information

Neither LMI nor any company that is competing for the award of a government contract or subcontract may knowingly obtain (nor may government employees knowingly disclose) contractor bid or proposal information or the government's source selection information before the award of a federal contract to which the information relates.

Source selection information includes the following:

- Bid prices submitted to the government
- Proposed costs or prices submitted to the government
- Source selection plans
- Technical evaluation plans
- Technical evaluations of proposals
- Cost or price evaluations of proposals
- Competitive range determinations
- Rankings of bids, proposals, or competitors
- Reports and evaluations of source selection panels, boards, or advisory councils
- Any information marked "Source Selection Information."

Information subject to the Procurement Integrity Act need not be in writing; it can be oral. In addition, the information need not be intentionally obtained: unintentionally receiving the information can also violate the Procurement Integrity Act. Improper disclosure or receipt of unauthorized information may result in criminal, civil, and administrative penalties. LMI employees must immediately report any known or suspected unauthorized release or receipt of nonpublic information to LMI's Chief Performance Officer, Law department, or the LMI Hotline by phone (844.627.6599) or visit lmi.ethicspoint.com.

Suspended, Debarred, and Ineligible Contractors

The U.S. General Services Administration compiles and maintains the List of Parties Excluded from Federal Procurement and Nonprocurement Programs, which sets forth the names of firms and individuals debarred, suspended, proposed for debarment, or declared ineligible to receive government contracts. LMI will not do business with such persons or companies. The list is continually updated and readily available in written and electronic form on SAM.gov, as described in FAR 9.404 (48 C.F.R. 9.404). LMI's employees shall follow processes laid out in the Procurement Manual to comply with the federal requirements.

Contingent Fees

LMI employees are not permitted to enter into contingent fee arrangements with any person or agency to solicit or obtain a government contract. "Contingent fee" means any commission, percentage, brokerage, or other fee that is contingent upon the success of a person or company in securing a government contract. Federal law generally prohibits such arrangements as contrary to public policy because they may lead to attempted or actual exercise of improper influence.

If an LMI employee is approached to enter into a contingent fee arrangement, the employee must immediately contact LMI's Chief Performance Officer or Law department.

Antitrust and Bid-Rigging

Close collaboration among marketplace participants can improve and enhance the services that the government receives. Such collaboration must be for the purpose of improved client service and not for establishing improper market control. LMI operates in compliance with antitrust laws that are designed to ensure fair competition and to preserve the free enterprise system. Some of the most common antitrust issues that may confront an employee involve pricing, bid-rigging, market allocation, boycotts, and trade association activity.

All bid and proposal pricing must be arrived at independently and must be free from collusive bidding with competitors or any other practice that runs afoul of federal antitrust laws. Even an oral exchange can be viewed as an agreement that may violate applicable antitrust laws.

The following actions may be perceived as anticompetitive and, accordingly, may constitute violations of law. LMI employees shall not, under any circumstances, agree with a competitor to

- charge certain prices,
- allocate markets or clients,
- engage in reciprocal dealing, or
- undertake collusive action in pricing a bid to a client, such as bid-rigging.

Antitrust laws are strictly enforced. Violations may result in severe sanctions, such as significant monetary penalties against LMI, as well as sanctions against individual employees, including fines and prison sentences. Antitrust laws are complex, and employees are instructed to take special care in this area. Any questions or concerns should be raised with LMI's Chief Performance Officer or Law department.

Contract Negotiating and Pricing

LMI adheres to truthfulness in all aspects of its business, including in negotiating contracts with clients. LMI employees must ensure accuracy, truthfulness, and completeness in all representations. In negotiating government contracts, LMI has an affirmative duty under certain circumstances to disclose (and possibly certify) current, accurate, and complete cost or pricing data. Moreover, submitting to a government client a proposal, quotation, or other document or statement that is false, incomplete, or misleading can result in civil and criminal liability for LMI, the involved employee, and any supervisors who condone such a practice.

Costs and Expenses

LMI employees who record time on contracts must do so in a complete, accurate, and timely manner. Employees performing government contracts must ensure that the number of hours worked and costs incurred are applied to the correct account. Consult the Time Recording Policy for more details. No cost may be billed to a government contract if it is unallowable according to regulations or contract provision or is otherwise improper.

LMI employees must document expenses properly incurred in performing company business promptly, accurately, and completely on expense reports. In filing expense reports, employees must identify with specificity the nature and purpose of the expenses reported. In this regard, employees should adhere to the processes found in the Miscellaneous Expense Voucher Policy and the policies on Local Travel and Parking Expense Reimbursement and Nonlocal Travel.

Contract Claims

LMI must follow detailed procedures to resolve contract disputes with the government. LMI's government contracts require it to submit written claims when seeking additional payment, which often must be certified. Like all government submissions, these certifications are subject to federal laws regarding false statements and false claims. LMI employees must take great care in preparing claims and ensuring that all statements, representations, and monetary amounts in the claim are complete and accurate in all respects.

Performance Integrity

False Statements

LMI adheres to the highest standards of honesty and integrity. Our policies prohibit anyone from knowingly making false, fictitious, or fraudulent statements or representations concerning LMI's government contracts or performance under these contracts.

Federal laws prohibit false statements concerning any matter within the jurisdiction of the executive, legislative, or judicial branches of the U.S. government or falsifying, concealing, or covering up a material fact. The prohibition includes oral and written statements (sworn and unsworn), forms, certifications, invoices, letters, time cards, receipts, travel reimbursements, and statements that are material to a claim to the government for payment or approval. Moreover, the statement need not be made directly to the government; it is sufficient that a false statement could affect some aspect of an agency's function. Many states have laws that impose similar liability.

All interactions with the government must be truthful and accurate. Submitting a proposal, quotation, or other document or statement that is false, incomplete, or misleading to a government client can result in civil and criminal liability for the company, the involved employee, and any supervisors who condone such a practice. LMI employees preparing proposals or bids must ensure accuracy and truthfulness in all statements, communications, and representations to prospective government clients. Likewise, in negotiating contracts with any client, LMI employees must be truthful, accurate, and complete at all times.

False Claims

LMI must adhere to the requirements of the False Claims Act, which governs the submission of claims to the government for payment or approval. LMI employees must ensure that any request for payment or approval sent to the U.S. government or to any of its agencies is accurate in all respects. No false request for payment or



approval may be made to the government, government contractor, grantee, or other recipient of funds to be spent or used on the government's behalf or to advance a government program or interest. Neither may LMI retain overpayments from the government.

The False Claims Act imposes monetary penalties against any person who knowingly presents a false or fraudulent claim for payment or approval; who knowingly makes or uses a false record or statement material to a false or fraudulent claim; who knowingly makes or uses a false record or statement material to an obligation to pay money to the government; or who knowingly conceals or knowingly and improperly avoids or decreases the obligation to pay or transmit money or property to the government. This includes submitting false or overstated time cards or invoices. The False Claims Act also imposes penalties on any person who is authorized to make or deliver a document certifying receipt of property and with intent to defraud the government, makes or delivers

the receipt without knowing that the information on the receipt is true, or who knowingly buys or receives a pledge of public property from a government employee who is not authorized to sell or pledge property. Any person who causes or conspires to commit any of these violations is subject to civil penalties under the False Claims Act.

In addition, the False Claims Act imposes criminal penalties on any person or corporation who knowingly makes or presents a false, fictitious, or fraudulent claim to the government, or who enters into any agreement, combination, or conspiracy to defraud the United States or any federal department or agency by obtaining or aiding in obtaining payment or allowance of any false, fictitious, or fraudulent claim.

The government enforces these laws vigorously, and what may seem a minor oversight on an invoice can form the basis for a civil or criminal violation.

Conflicts of Interest

There are two types of conflicts of interest that LMI seeks to avoid: personal conflicts of interest and organizational conflicts of interest.

Personal Conflicts of Interest

A personal conflict of interest arises when personal interests compromise our ability to make objective business decisions on LMI's behalf. Even the appearance of a conflict of interest can damage LMI's reputation. LMI employees must avoid situations where it even appears that you are using your position at LMI for personal gain.

Actual or potential conflicts of interest include

- employment by a competitor or potential competitor while employed by LMI;
- acceptance of gifts, payment, or services from those seeking to do business with LMI;
- placement of business with a firm owned or controlled by an employee or his or her family (see the Restrictions on Doing Business with Interested Persons Policy for additional guidance);
- ownership of, or substantial interest in, a company that is a competitor, subcontractor, vendor, or supplier of LMI;
- an LMI employee acting as a supervisor or manager of a family member who is an LMI employee or contractor; and
- serving as an employee, independent contractor, or advisor to an LMI client or supplier.

All actual or potential personal conflicts of interest must be disclosed. Any employee who feels that he or she may have an actual or potential personal conflict of interest must report the conflict to LMI's Human Resources department so that the actual or potential personal conflict of interest may be avoided, neutralized, or mitigated, as appropriate.

Outside employment (commonly called "moonlighting") may create a personal conflict of interest. Any LMI employee seeking to engage in moonlighting must first seek the approval of the employee's immediate supervisor and LMI's Human Resources department.

Organizational Conflicts of Interest

An organizational conflict of interest occurs when, because of relationships or circumstances,

- a contractor sets the "ground rules" for a federal procurement (e.g., writing a procurement's statement of work or specifications, or performing systems engineering and technical direction for the procurement) that appears to skew the competition in favor of the contractor;
- a contractor's work under a federal contract requires the contractor to evaluate proposals or past performance of itself or a competitor, calling into question the contractor's ability to render impartial advice to the government; or
- contractor has access to nonpublic information as part of its performance of a federal contract that may provide the contractor (or an affiliate) with an unfair competitive advantage in current or future procurements.

LMI identifies and avoids or mitigates organizational conflicts of interest.

LMI employees must be attentive to potential organizational conflicts of interest so that LMI may evaluate the possibility that work performed on one contract may preclude LMI from competing for certain subsequent contracts. Organizational conflicts of interest may arise when LMI is asked to do the following:

- Support a client related to future requests for proposal
- Support a client related to statements of work or performance work statements for future acquisitions, including the preparation of white papers that may influence or form the basis of statements of work for future acquisitions
- Support a client related to system requirements for future acquisitions
- Support a client related to specifications for future acquisitions
- Support a client related to evaluation of LMI products or services, or those of a competitor

- Access nonpublic information, such as budget or source selection information, or information related to potential competitors' pricing or technical solutions, that may give LMI an unfair competitive advantage in a future acquisition.

Alert LMI's Chief Performance Officer or Law department immediately to potential organizational conflicts of interest of which you become aware. LMI employees may also refer to the Organizational Conflicts of Interest Policy for detailed guidance.

Protecting Information and Data

Unauthorized Access to Computers

An employee's duties may involve accessing a computer, a data storage facility or device, or a related communications facility belonging to an outside organization. Employees are prohibited from engaging in any activities that result in unauthorized access to a computer or database. Federal law makes it a crime to access a computer without authorization or to access with authorization but use such access to obtain or alter information in the computer that the user is not entitled to obtain or alter.

Before accessing an outside computer requiring authorization, employees must request and obtain written authorization from a person who is empowered to provide it. Any request for authorization should make clear what type of access is sought. Employees should not presume that they have valid authorization on the basis of access granted during previous employment or for any other reason. Upon receipt of written authorization, employees must be careful not to exceed the access authorized.

Maintaining and Safeguarding Information

LMI is committed to complying with all applicable laws and regulations requiring safeguarding of government information. Employees granted access to sensitive client information are responsible for being aware of and following all applicable rules.

Controlled Unclassified Information

"Controlled unclassified information" (CUI) is information that, by law, regulation, or business necessity, requires protection under 32 C.F.R. part 2002. The security and protection of CUI depends upon every employee's compliance with LMI's physical and information security policies and procedures and, where applicable, the policies and procedures of LMI's customers, suppliers, contracting partners, and competitors. CUI may not be disclosed to anyone without proper authorization. Every LMI employee must keep CUI protected and secure. Employees are advised to review the Protection of CUI and OCI Policy for detailed guidance.

Cyber Incident Reporting

Cyber incidents affecting covered defense information or covered contractor information systems, or LMI's ability to perform operationally critical support, are subject to mandatory, time-sensitive reporting. On contracts subject to Defense Federal Acquisition Regulation Supplement (DFARS) clause 252.204-7012, LMI must review affected systems for compromise and rapidly report the incident to the Department of Defense – within 72 hours of discovery – and must preserve affected system images and related monitoring data for the required period. Any employee who discovers or suspects a cyber incident affecting a government system, covered defense information, or a covered contractor information system must *immediately* notify [LMI's cybersecurity team](#) and the [Law department](#) so that LMI can meet the 72-hour reporting deadline. Do not wait to confirm the full scope of an incident before reporting it internally.

Classified Information

The NISPOM prescribes the requirements, restrictions, and other safeguards to prevent unauthorized disclosure of classified information. All employees must comply fully with the NISPOM. In addition, the Standard Practice Procedures—Security Policy provides guidance about LMI's security function and procedures.

Doing Business with Foreign Persons and Entities

LMI is committed to complying with all laws and regulations when doing business with foreign persons and entities. LMI vets all foreign persons and entities with whom it does business against all relevant denied parties screening lists. Employees considering doing business with foreign persons or entities must first contact LMI's Law department for guidance.

Foreign Corrupt Practices Act

The Foreign Corrupt Practices Act (FCPA) prohibits giving, offering, or promising anything of value to foreign officials, foreign political parties, or foreign candidates for the purpose of influencing them to use their official capacity to obtain, keep, or direct business or to gain any improper advantage. In addition, the FCPA prohibits knowingly falsifying corporate books and records or knowingly circumventing or failing to implement accounting controls. Employees involved in international operations must be familiar with the FCPA and similar laws that govern LMI's operations in foreign countries. LMI's procedures in this area are outlined in the Anti-Bribery and the Foreign Corrupt Practices Act Policy.

Each employee has a responsibility to fulfill LMI's commitment to comply with the FCPA, including the duty to seek interpretation or assistance when in doubt. LMI employees with questions concerning FCPA requirements should contact LMI's Law department.

U.S. Export Controls Compliance

LMI fully complies with all applicable U.S. export control laws and regulations governing exports of controlled products, technical data, and services from the United States. Violations of export control laws and regulations can harm U.S. national security and foreign policy. Penalties for violations are severe and include monetary fines, imprisonment, and suspension of export and government contracting privileges. The applicable regulatory regime depends on the type of goods, technology, or services being exported and the intended destination. To ensure compliance, each LMI employee must abide by U.S. export and import control laws and regulations and LMI's compliance policies and procedures. Employees should review the U.S. Export-Import Controls Policy for detailed guidance.

Foreign Asset Controls

To comply with the Trading with the Enemy Act and the International Emergency Powers Act, and in some cases to comply with sanctions imposed by the United Nations, the United States imposes sanctions and embargoes on certain countries. The Department of the Treasury, Office of Foreign Assets Control (OFAC), administers regulations that may involve blocking property, prohibiting exports and re-exports, and other activities with respect to those countries. OFAC maintains a list of "Specifically Designated" nationals or persons who are subject to restrictions under the regulations. LMI screens potential business partners to ensure they are not designated on OFAC's list. Refer to the Industrial Security Notification of Business with Foreign Entities, Foreign Travel, and Hosting Foreign Visitors Policy for detailed guidance.

Anti-Boycott Regulations

In addition to export controls, the U.S. Export Administration Regulations contain anti-boycott provisions that prohibit compliance with non-U.S. boycotts of countries friendly to the United States. The Internal Revenue Code imposes tax penalties for agreements to comply with such boycott actions. LMI shall neither enter into such agreements nor participate in any impermissible boycotts. If any LMI employees are asked to participate in such boycotts or enter into agreements containing boycott requirements, they should immediately seek guidance from LMI's Law department.

Combating Human Trafficking

The U.S. government and LMI prohibit trafficking in persons, including trafficking-related activities, in compliance with Federal Acquisition Regulation Subpart 22.17. LMI prohibits its employees, independent contractors, subcontractors, and subcontractor employees from engaging in such trafficking and must abide by the requirements contained in the Combating Human Trafficking Policy.

Employees, subcontractors, subcontractor employees, and agents with credible information regarding a potential violation of this policy must promptly report such information to LMI's Chief Performance Officer or Law department. Alternatively, violations may be reported anonymously to the LMI Hotline by phone (844.627.6599), or visit lmi.ethicspoint.com. Employees aware of potential human trafficking violations may also contact the Global Human Trafficking Hotline by phone (844-888-FREE) or email (help@befree.org).

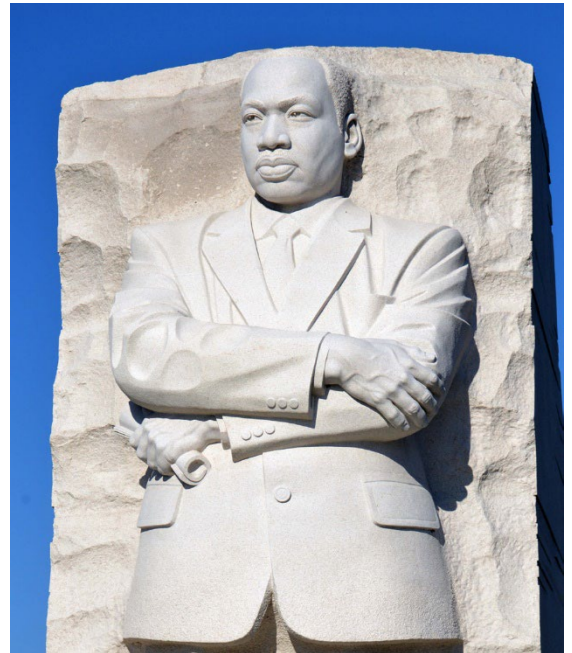
Social Policies and Compliance

LMI has assumed responsibilities applicable to companies that conduct business with the government. LMI's policies and practices seek to achieve, among other things, equal employment opportunity for all workers a workplace free from harassment and violence, maintenance of a drug-free workplace, and environmental protection.

Equal Employment Opportunity

LMI complies fully with all applicable laws and regulations. LMI affords equal employment opportunity to qualified individuals, regardless of their race, color, religion, sex, sexual orientation, gender identity, national origin, pregnancy, disability, age, protected veteran status, citizenship status, or any other factors protected by applicable law. LMI's policy of equal opportunity pertains to all aspects of the employment relationship, including application and initial employment, promotion and transfer, selection for training opportunities, wage and salary administration, and the application of service, retirement, and employee benefit plan policies. All LMI employees or applicants who wish to review documentation required by law to be provided by LMI, may contact any member of LMI's Human Resources department by submitting a request in UKG Pro, Getting HR Assistance.

Employees should review LMI's Equal Employment Opportunity Policy and the Nondiscrimination and Anti-Harassment Policy. Report violations to LMI's Chief Performance Officer, Law department, or the LMI Hotline by phone (844.627.6599), or visit lmi.ethicspoint.com.



Harassment and Workplace Violence

LMI has zero tolerance for harassment and workplace violence. All manners and forms of illegal workplace harassment are expressly prohibited. LMI employees must treat coworkers with respect, and LMI will not tolerate behavior that creates an intimidating, offensive, or hostile work environment. Further information is available in the Nondiscrimination and Anti-Harassment Policy.

If an employee experiences or witnesses violation of LMI's anti-harassment or workplace violence policies, including sexual harassment, discrimination, violence, and intimidation, contact LMI's Chief Performance Officer or Law department immediately. Alternatively, violations may be reported anonymously to the LMI Hotline by phone (844.627.6599), or visit lmi.ethicspoint.com.

Drug-Free Workplace

LMI is committed to providing a drug-free, safe, and healthy work environment for all employees. LMI's commitment is addressed in more detail in the Drug-Free Workplace Policy in the Employee Handbook.

Responsibility to Protect the Environment

LMI encourages its employees to exercise good judgment with regard to the environmental aspects of LMI's use of buildings and other real estate, client deliverables production processes, and waste disposal practices. LMI takes all necessary actions to eliminate the generation and discharge of hazardous materials and to ensure the safe disposal of such materials. LMI complies fully with all federal, state, and local environmental protection laws.

U.S. Customs and Immigration Regulations

LMI complies with U.S. customs and immigration regulations, which are administered by the U.S. Department of Homeland Security through U.S. Customs and Border Protection, the U.S. Bureau of Immigration and Customs Enforcement, and U.S. Citizenship and Immigration Services. These regulations govern the movement of commodities and people across U.S. borders. Information required under these regulations enables federal agencies to properly assess duties; collect accurate statistics; determine whether goods are subject to quotas, restraints, embargoes, or other restrictions; and take enforcement actions by deterring, interdicting, and investigating threats arising from the movement of commodities and people across borders.

Lobbying and Political Activity

LMI respects employees' rights to engage in political activities and we encourage employee civic engagement. However, employees may not engage in political activity during work hours or use LMI or our clients' time or resources for personal political activities. Likewise, employees may not use LMI's name, logo, or letterhead while engaging in personal political activities.

We are committed to complying with all lobbying disclosure rules and regulations. As a result, any direct lobbying activities on behalf of LMI must be approved by our chief executive officer and coordinated through the Law department. Employees with questions about lobbying or political activities should contact the Law department.

Reporting Violations, Training, and Use of Judgment

There are a number of situations in which LMI may be required to disclose information to the government. Whether or not LMI has a mandatory disclosure obligation, LMI may wish to make disclosures to the government about certain violations of this Code of Ethics or its policies for different reasons, including maintaining trust with its customers. LMI's employees must report violations of LMI's Code, policies, or laws or regulations that come to their attention.

Mandatory Disclosure Obligations

LMI has an obligation to make timely written disclosure when we have credible evidence that—in connection with the award, performance, or closeout of any government contract or a subcontract—a principal, employee, agent, or subcontractor of LMI has committed a violation of federal criminal law involving fraud, conflict of interest, bribery, or gratuity violations found in Title 18 of the U.S. Code or a civil violation of the False Claims Act or in certain circumstances where LMI has received a significant overpayment. Every LMI employee has an obligation to report known or suspected violations of this nature to LMI's Chief Performance Officer, Law department, or the LMI Hotline by phone (844.627.6599) or visit lmi.ethicspoint.com.

The Employee's Commitment

In addition to mandatory disclosure obligations, every LMI employee has an obligation to report known or suspected violation of the Code of Ethics to LMI's Chief Performance Officer, Law department, or the LMI Hotline. Given the critical role that LMI's employees play in our Compliance Program, employees should ask questions, seek guidance, and report observations or concerns as soon as they arise. Employees are encouraged to discuss ethical or compliance issues with the Chief Performance Officer, Law department, or senior leader, including LMI's CEO and the Chief Human Resources Officer.

The LMI Hotline is available 24 hours a day, 7 days a week, by phone (844.627.6599), or visit lmi.ethicspoint.com. Use these resources to report concerns or observed or suspected violations or to ask ethics or other compliance questions.

Non-Retaliation

Non-Retaliation and Whistleblower Rights

LMI prohibits retaliation against individuals who report misconduct in good faith. Employees who retaliate or attempt to retaliate for good faith reporting of observed or suspected misconduct will be subject to discipline. Retaliation in any form is itself a serious violation of LMI's Code and must be reported immediately.

Statutory whistleblower protections.

Federal law separately protects LMI employees from reprisal. An LMI employee may not be discharged, demoted, or otherwise discriminated against as a reprisal for disclosing information that the employee reasonably believes is evidence of:

- gross mismanagement of a federal contract or grant;
- a gross waste of federal funds;
- an abuse of authority relating to a federal contract or grant;
- a substantial and specific danger to public health or safety; or
- a violation of law, rule, or regulation related to a federal contract (including the competition for or negotiation of a contract) or grant.

Protected reporting channels.

These protections apply whether the employee reports internally or to the government. A protected disclosure may be made to any of the following:

- a Member of Congress or a representative of a congressional committee;
- an Inspector General;
- the Government Accountability Office;
- a federal employee responsible for contract or grant oversight or management at the relevant agency;
- an authorized official of the Department of Justice or other law enforcement agency;
- a court or grand jury; or
- an LMI management official or other employee who has responsibility to investigate, discover, or address misconduct.

LMI encourages employees to raise concerns internally through the channels described in this Code so that LMI can address them promptly, but an employee is never required to report internally first, and reporting to any of the government bodies listed above is fully protected.

These rights cannot be waived.

The rights and remedies provided under federal whistleblower law may not be waived by any agreement, policy, form, or condition of employment. No confidentiality, non-disclosure (i.e., NDA), or information-protection obligation in this Code, in any LMI policy, or in any agreement an employee signs limits an employee's right to lawfully report waste, fraud, or abuse — or to provide related information — to a Member of Congress, an Inspector General, or other authorized government official. Employees making such reports must continue to follow all laws, regulations, and government procedures regarding protection of classified information.

Other Hotlines

Besides LMI's own internal hotline, employees may use various government hotlines to report suspected violations. Information on many of these hotlines is available on posters in common work areas at LMI. For ease of reference, here are the available hotlines:

- Equal Employment Opportunity Commission—800.669.4000
- Department of Labor—202.693.6999 or 800.347.3756
- Department of Defense, Office of Inspector General—800.424.9098
- Department of Homeland Security, Office of Inspector General—800.323.8603
- Department of Justice, Disaster Fraud Hotline—866.720.5721
- Global Human Trafficking Hotline—844.888.FREE or help@befree.org.

Record Retention and Audit Access

The laws concerning government contracts contain strict rules requiring LMI to maintain accurate and complete records (including records in electronic format), even years after contract performance has ended. For this reason, it is important for employees to adhere to the Records Management, Retention, and Destruction Policy. Transactions between LMI and outside individuals and organizations should be timely and accurately entered in LMI's books in accordance with generally accepted accounting principles. LMI employees should never misrepresent facts or falsify records in any manner, or even consider engaging in such acts.

LMI will fully cooperate with any government agency responsible for audits, investigations, or corrective actions relating to LMI's contracts or legal obligations. Full cooperation means providing timely and complete responses to government auditors' and investigators' requests for documents and information, and access to employees with relevant information necessary to meet LMI's obligations. Employees who receive a request for information from the government should contact the Law department (lawdepartment@lmi.org) promptly for guidance.

To ensure LMI responds accurately and consistently, employees who receive a government request for financial data, records, or access should promptly coordinate with LMI's Finance and Law departments before responding, so we can ensure the response is complete, accurate, and properly documented. This internal coordination is intended to organize and expedite LMI's response — not to withhold, delay, or limit information the government is entitled to receive. Employees may not conceal, alter, or destroy any document or withhold any information requested during a legitimate government audit, investigation, or request for information.

Training and Internal Compliance Audits

Training

Employees shall attend regularly scheduled ethics training programs upon hire and annually thereafter.

Internal Compliance Audits

LMI's Finance department will, in conjunction with independent and internal auditors, conduct a periodic compliance audit to ensure that company business practices conform to the Code. LMI's Chief Performance Officer may also conduct periodic ethics audits.

Use of Judgment

The Code of Ethics outlines the major obligations of LMI employees, but the guidelines set forth in the Code must be supplemented by good judgment. Employees should ensure at all times that their actions are consistent with LMI's core values: (1) advancing LMI's public interest, (2) always doing the right thing and being truthful, and (3) treating everyone with respect and dignity.

Employees should avoid the kind of thinking represented by these phrases that is likely to lead to violations of ethical standards and laws:

- "Well, maybe just this once."
- "No one will ever know."
- "It doesn't matter how it gets done, as long as it gets done."
- "Everyone does it."
- "Shred that document."
- "We can hide it."
- "No one will get hurt."
- "This will destroy the competition."
- "We didn't have this conversation."

Instead, employees should ask themselves the following questions on a frequent basis:

- "Am I being fair and honest?"
- "Will my action stand the test of time?"
- "How will I feel about myself afterward?"
- "How would it look in the newspaper?"
- "How would I feel if my family, friends, and neighbors knew what I was doing?"
- "Will I be proud of my action?"

"How would I feel if I learned that my competitor had taken the action I am contemplating?"



Employee's Acknowledgement

Each LMI employee must acknowledge that he or she

- has received a link to the Code of Ethics ("Code"),
- understands how to locate the Code on LMI's intranet,
- understands that it is his or her responsibility to read the Code,
- must abide by the standards set forth in the Code, and
- knows whom to contact with questions about the Code.

Compliance and Discipline

Failure to comply with the standards outlined in this Code may result in disciplinary action ranging from simple warning to termination, referral for criminal prosecution, and/or reimbursement to LMI for losses or damages resulting from the violation. As with all matters involving disciplinary action, principles of fairness apply. Employees charged with a violation will be afforded an opportunity to explain their actions before disciplinary action is taken.

Employees subject to disciplinary action include the following:

- Those who authorize or participate in actions that violate LMI's ethical standards
- Those who deliberately fail to report a violation or deliberately withhold relevant and material information concerning a violation
- A violator's managerial superiors, where the circumstances of the violation reflect inadequate supervision or a lack of due diligence
- Any supervisor who retaliates, directly or indirectly, or who encourages others to retaliate against an employee who reports a violation.

Employee Acknowledgement

I, _____, acknowledge that I have received a copy of LMI's Code of Ethics, that it is my responsibility to read and abide by it, and that I know whom to contact with questions about it.

Signature of Employee _____ Date _____

