



# Code of Conduct and Ethics

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## LETTER FROM THE CHIEF EXECUTIVE OFFICER

Accelint team,

Every day, by our actions, we are earning the trust of our customers and partners to create solutions that help improve mission readiness. That privilege comes with a significant responsibility to act in a manner worthy of their cause. Our customers, and our teammates all expect that from us.

This Code of Conduct & Ethics is a guide to help us live up to their expectations and ensure we, at all times, conduct business transparently, honestly, and ethically. If we execute with those virtues in mind, we will win and win the right way.

It is up to us — you and me — living up to the values our stakeholders expect of us and holding each other accountable to be our best. You have my commitment to foster a culture of openness where issues can be freely raised, discussed, and addressed, and I urge you to do the same.

Thank you for being a valued partner in this journey. Our work is important to the world and, together, we will make an incredibly positive impact.

All the best,

Brian Morrison  
Accelint Chief Executive Officer



## WE COMMIT TO INTEGRITY AND COMPLIANCE

At the heart of the Code of Conduct are our Core Values. Our values define the basic tenets on which we conduct business and how we measure and evaluate our decisions and actions. Accelint's strong ethical reputation is a critical asset, and each of us share a personal responsibility to protect, preserve, and enhance it.

The Code of Conduct is a key part of our Corporate Compliance and Ethics Program (the "Program"), which ensures that the Code of Conduct's provisions are communicated effectively to employees and enforced through Accelint's policies, procedures, and management practices (collectively, "Policies").

### To Whom Does the Code of Conduct Apply?

This Code of Conduct applies to all directors, officers, and employees of Accelint, as well as contractors, consultants, subcontractors, and other representatives acting on behalf of the Company. It applies to all Company business activities without exception.

For purposes of this Code, the term "employees" may also include individual consultants or contractors engaged by the Company to perform services for its customers when acting on the Company's behalf.

### How is the Code of Conduct Administered?

The most current version of the Code of Conduct is available on Accelint's home page, Accelint Central. Additionally, new hires receive a copy of the Code of Conduct and yearly training is provided to all employees. Every employee is asked to sign an acknowledge that they have received, read, and understand the Code of Conduct and agree to comply with it. The Code of Conduct is reviewed annually and modified when necessary. Any modifications or changes to the Code of Conduct will be promptly communicated to all employees.

## SPEAKING UP AND ENSURING SUCCESS

### Duty to Report Actual or Suspected Code of Conduct Violations

Every employee, officer, consultant, agent, vendor, subcontractor, or other representative of Accelint having information or knowledge of any actual or contemplated conduct or transaction(s) which appears to violate Accelint's Code of Conduct, Policies and Procedures, or standards is expected to report the matter promptly to their supervisor, Human Resources (HR), Facilities Security Officer (FSO), or any member of Senior Management.

**ACCELINT HOTLINE:** Accelint uses an external hotline provider (AllVoices) that enables the reporting of concerns anonymously. The Hotline operates 24/7 and can be reached online at: <http://accelint.allvoices.co/>

Employees can also report by calling the US/Canada toll-free hotline number: 844-215-9976

Reporting may be written or oral, telephonic, or via email. In addition, reporting may be anonymous – if requesting anonymity, Accelint will make reasonable efforts to protect the identity of the person disclosing such information confidential in so far as doing so does not impede an investigation or resolution of the matter. Confidentiality cannot be guaranteed. Failure to report actual or suspected Code of Conduct violations subjects such persons to disciplinary action up to and including immediate termination of employment without notice.

Employees are expected to report concerns in good faith. Reports made maliciously or with knowingly false information may result in disciplinary action.

### **No Tolerance for Retaliation**

It takes courage to speak up when something is not right. We understand that you might be uncomfortable or anxious. That is why we do not tolerate retaliation. Employees may refer to Accelint's Anti-Retaliation Policy.

#### **KNOW THAT YOU WILL NOT SUFFER ADVERSE CONSEQUENCES FOR:**

- Refusing to do something that violates this Code of Conduct, Accelint's policies, or the law, even if your refusal results in the loss of business to Accelint.
- Reporting under 41 U.S.C. § 4712, (1) violations of a law, rule or regulation related to a federal contract or grant; (2) gross mismanagement of Federal contract or grant; (3) gross waste of Federal funds; (4) abuse of authority relating to a federal contract or grant; or (5) Substantial and specific danger to public health or safety.
- Raising a concern in good faith about potential misconduct.
- Cooperating with an investigation.

Anyone who retaliates against an employee for engaging in any of these activities will be subject to disciplinary action, up to and including termination.

### **Accelint's Role in Ensuring Success**

Among other activities, Accelint works to ensure the success of its Program by:

#### **Training:**

- Providing annual training on the Program to all employees.
- Providing specific/directed compliance & ethics training to employees based on risks and roles.

#### **Hiring:**

- Not knowingly allowing someone who has engaged in unethical conduct to work at Accelint.
- Not knowingly hiring (as an employee or a contractor) anyone who is suspended or debarred by any agency of the federal government, or who otherwise is not eligible to participate in federal programs.

#### **Employee Resources:**

- Maintaining a secure, confidential resource that all employees can use to report unethical behavior or other employee concerns.
- Investigating possible violations of the Code of Conduct, Policies and Procedures, or standards.
- Providing a safe and healthy work environment for our employees, clients, and visitors, and complying with all applicable federal, state, and local laws and regulations.
- Prohibiting any retaliatory action against employees who report violations or suspected violations of the Code of Conduct, Policies and Procedures, or standards. Employees determined to have engaged in retaliatory behavior will be subject to disciplinary action up to and including termination without notice.

#### **Code of Conduct Policy Statement**

##### **IT IS ACCELINT'S POLICY TO:**

- Conduct business according to high ethical and legal standards.

- Insist that employees avoid business activities and situations that may create — or appear to create — an appearance of impropriety.
- Maintain accurate and reliable corporate records in accordance with generally accepted accounting principles and practices and other required or appropriate internal controls and recordkeeping requirements; and
- Engage in business activities in an ethical manner and in accordance with all applicable laws and regulations.

### **Ethics Officer**

Accelint designates the Chief Operating Officer (COO) as its Ethics Officer. The Ethics Officer is responsible for overseeing company ethical standards and ensuring adherence to this Code of Conduct and Ethics.

### ***Employee Support***

Accelint recognizes that employees must have access to reliable, predictable, and supportive resources that help them comply with the Code of Conduct.

### **THAT'S WHY ACCELINT PROVIDES:**

- An “open door” policy that gives every employee access to higher levels of management.
- A work environment that expressly prohibits retaliation and retribution, discrimination, bullying, and harassment of any kind.
- A 24/7 reporting website where employees can anonymously communicate concerns, available at: <http://accelint.allvoices.co/>.

### **Role Of Accelint’s Employees in Ensuring Program Success**

Accelint’s employees are the face of Accelint. It is our employees who, day in and day out, interact with our customers, vendors, suppliers, one another, and the public at large. Consistent with guidance provided in this Code of Conduct, each of us must be committed to living our values, acting always with integrity and fairness, and serving as role models, through our words and actions, of upstanding ethical behavior.

To better understand and appreciate the behaviors expected of Accelint’s employees, each Accelint employee is responsible for reading and abiding by this Code of Conduct and participating in required trainings. Accelint employees must also know and follow all Accelint’s Policies and Procedures, laws, and regulations that apply to our work.

Regardless of your position with Accelint, if you have information about or knowledge of any actual or contemplated misconduct, conduct, or transaction that appears to violate the Code of Conduct and Ethics Policies and Procedures, or standards, you are expected to report the matter promptly to your supervisor or manager, to HR, or to any member of management. You can make such reports in person, by telephone, or in writing (including email). Requests for anonymity from reporting employees will be honored to the extent reasonably possible, but anonymity cannot be guaranteed.

If you want to remain anonymous, you may report your concern using our reporting platform AllVoices. When utilizing AllVoices, employees are asked to provide sufficient detailed information to enable adequate investigation. Anonymous reporters should realize that anonymity could impact the ability to conduct a thorough investigation.

TO REPORT A CONCERN, ISSUE, OR SUSPECTED CODE OF CONDUCT POLICY OR ETHICS VIOLATION, YOU MAY:

- Speak with your Supervisor or a member of HR.
- Speak with any Accelint Executive or member of management.
- Submit a report in the Accelint AllVoices reporting platform - <https://accelint.allvoices.co/>

**Role of Accelint’s Management in Ensuring Program Success**

Though we view all Accelint’s employees as leaders, our managers and supervisors have more formalized leadership expectations and, therefore, additional responsibilities in ensuring the success of our Program. They are expected to:

- Promote and demonstrate upstanding ethical tone and behavior.
- Communicate compliance and ethics concerns and issues – up and down the chain of command.
- Hold employees accountable for completing all certifications and training requirements.
- Foster work environments that encourage open and honest communication and raising concerns.
- Report known or suspected ethical misconduct, Code of Conduct or Policy and Procedures violations, or illegal actions promptly and to the appropriate Accelint person(s).
- Honor and respect the confidentiality, to the greatest extent practically and legally allowed, of those who in good faith, raise concerns or participate in internal investigations.
- Ensure that those who report concerns are not retaliated against and report any concerns about such retaliation immediately.

*Laws and regulations are complex and subject to change often. They can also vary from state to state, country to country, or by nature of the client (private or governmental). Accordingly, all Accelint employees must be aware of and familiar with our Code, Policies and Procedures, and the laws and regulations applicable to each person’s job responsibilities and functions. All new policies or changes to existing Policies and Procedures will be communicated to all employees in a timely manner and a copy made available on Accelint Central. When in doubt, consult first a supervisor and/or Accelint policies. If you have further questions, please contact HR.*

**Role Of Accelint’s Partners in Ensuring Program Success**

Accelint expects that our teaming partners, subcontractors, contractors, agents, consultants, suppliers, and others working on our behalf conduct themselves in a manner consistent with this Code of Conduct, as well as any applicable Accelint Policies and Procedures, laws, and regulations. We exercise caution when considering whom we may engage or retain to act on our behalf.

If you know of or suspect any such parties to be acting unethically or involved in misconduct, report it to Accelint Management, HR, or use our reporting platform.

**Coverage of Principals**

For purposes of this Code of Conduct and Ethics, the term “principal” shall be interpreted consistent with the definition set forth in FAR 2.101 and applicable contract clauses, including FAR 52.203-13. A principal means an officer, director, owner, partner, or a person having primary management or supervisory responsibilities within the Company (e.g., general manager, plant manager, head of a business unit, division, or function), as

well as any individual who has the authority to bind the company, make significant business decisions, or exercise substantial influence over Company policies, operations, or government contracting activities.

## **GUIDELINES FOR DOING BUSINESS – ACT WITH INTEGRITY**

### **Accurate & Complete**

Employees are expected to exercise good judgment and maintain high ethical standards and personal integrity while conducting business on behalf of Accelint, including while they are traveling on Company business.

### **Accounting Policies**

Accelint's operations must be accounted for and recorded in accordance with legal requirements, such as the Federal Acquisition Regulation ("FAR") and Generally Accepted Accounting Principles (GAAP). The integrity of the Company's accounting is based on the validity, accuracy, and completeness of its systems and records. Every employee — regardless of position — who is involved in creating, processing, or recording accounting information for Accelint, including timekeeping, is responsible for the integrity of that information.

No false or intentionally misleading entries may be made in Accelint's systems, records, or related documentation.

### **Accurate Recording of Expenses**

Employees must properly record and document any expenses made by or on behalf of Accelint. This includes expenses related to any client, supplier, or other entity doing business with Accelint, as well as their employees or agents. Please direct any questions on how to properly record expenses and other relevant limitations directly to Accelint's Finance and Accounting department.

### **Timekeeping**

Each employee must accurately record their time on a daily basis in accordance with the established timekeeping Policies and Procedures. Each employee is expected to read, fully understand, and follow those Policies and Procedures. In reporting your time electronically, you are certifying that your time is being charged accurately and in accordance with those Policies and Procedures. Improperly shifting costs from one contract to another, improperly charging labor or materials, and falsifying timecards are strictly prohibited. If you have any questions or doubts regarding how to charge time or record costs, it is your responsibility to seek guidance. Accelint's employees may refer to their division's timekeeping policies for timekeeping guidance.

### **Reporting Practices**

If employees are asked for information during audits (internal and external) by Accelint accountants, HR, or legal counsel, they must provide complete and accurate information. No one in the company may conceal information that is necessary for the preparation of accurate books, records, accounts, and financial statements.

## LEGAL OBLIGATIONS

### Combating Trafficking in Persons

Accelint has a zero-tolerance policy regarding those who engage in or support trafficking in persons, procurement of any sex act on account of which anything of value is given or received by any person, or use of forced labor. No employee shall engage in, condone, or support such activities and all employees should be aware of and report any such concerns immediately to Accelint HR, management, or Accelint's reporting platform.

### Anti-Corruption

All employees, agents, subcontractors, consultants, and representatives acting on behalf of Accelint must fully comport with the provisions of the Foreign Corrupt Practices Act (FCPA) and no violations will be tolerated. All business associates or third parties who interact on Accelint's behalf with a foreign government or government-controlled entity must be provided with a copy of this Code of Conduct and Accelint's Anti-Fraud, Bribery & Corruption Policy, which they must agree to comply with.

The rule at Accelint is very simple: We do not pay bribes. Accelint considers a "bribe" to be anything that has a value and is offered, promised, or given to influence a decision to do business with Accelint. This includes obtaining new business, retaining existing business, or gaining any other improper advantage.

Be aware that a "bribe" may be something other than a payment (e.g., cash) offered to improperly influence a decision. It can take the form of a gift, favor, job, or offer of entertainment or travel. This applies not just to a person themselves, but to that person's family members, business interests, etc. – anyone that might influence that person's decision-making. For example, helping a foreign official's son get an internship or paying costs for that person to attend a conference could be considered a "bribe."

Accelint does not discourage individual employees, officers, or directors from participating in the political process in their own right, including the making of voluntary contributions to candidates or parties of their choosing.

But outside of the U.S., Accelint may not make political contributions, and you must ensure that your own political contributions are never conditioned upon any agreement or understanding to take or not take any particular governmental action on behalf of Accelint.

This same caution also applies when considering contributions for charities, communities, or social responsibility projects when someone associated with such activities is also associated with the government. Such contributions should be approved in advance by Accelint.

The FCPA is a complex law. Similar laws in other jurisdictions, such as the UK Bribery Act, are similarly complex and may be applicable to Accelint in certain situations. If you have any questions regarding Accelint's Anti-Fraud, Bribery & Corruption Policy, contact HR.

### Gifts, Gratuities, and Entertainment

Employees must be careful about giving or receiving gratuities, gifts, offers of entertainment, and other business courtesies because even gestures that seem simple and innocent can be harmful to Accelint's reputation and ability to conduct business. They may also violate laws and/or regulations, or third-party codes

of conduct or policies or procedures. Employees are advised to review Accelint's Employee Handbook and Anti-Fraud, Bribery & Corruption Policy. Employees may also contact their supervisor or HR for additional clarification or questions.

### **Lobbying Activities**

Accelint is prohibited from using federal funds to pay persons, such as lobbyists or consultants, to influence or attempt to influence executive or legislative decision-making in connection with the award or modification of any Government contract. No employee may hire such a lobbyist or consultant without the CEO's prior written authorization.

### **Political Activities and Contributions**

Accelint engages with policy makers from time to time to protect the interests of the company and its employees, as well as advance policies that strengthen the free enterprise system, create jobs, promote economic growth and opportunity, and advance business needs. We work to inform legislators on balanced, practical approaches to legislative issues that impact our business, people and customers.

All Accelint engagements with policy makers or regulators are governed by our Vision, Mission, Values, this Code of Conduct, and applicable laws and regulations.

Accelint follows applicable laws and regulations when hiring former public officials. Former public officials are required to comply with the laws and regulations of the agency where they formerly worked. Specific rules govern the hiring of former public officials in government business. Prior to initiating contact or having discussions, whether formal or informal, with a government employee regarding employment, Accelint management and personnel will seek guidance from management in accordance with the Accelint Conflict of Interest Policy.

Accelint does not make corporate political contributions to federal office candidates in the U.S., as such contributions are prohibited by law. Accelint has a political action committee that solicits and receives contributions from employees (and other Accelint affiliated individuals) and makes contributions to political candidates.

Accelint respects the right of employees to be involved in political activity and to contribute their own time and resources. Such activity, however, must not take place on Company time or property, nor involve the Company's name, and the Company will not reimburse employees for any contributions they may make. Laws and regulations governing contributions to state and local candidates vary from state to state, and all employees shall act in accordance with all such laws and regulations. Questions concerning political contributions should be directed to management.

Accelint does not donate to political campaigns outside the United States. Outside of the U.S., Accelint employees shall not use either Accelint funds or their own funds to make direct or indirect payments or give gifts, whether in the form of money or any other thing of value, to a political party or member of a political party without prior written approval from Accelint's CEO.

### **International Business**

Accelint acts with integrity and ethically in all business dealings and complies with all applicable laws and regulations wherever we do business. Almost every country in the world prohibits making payments or offers

of anything of value to government officials, political parties, or candidates in order to obtain or retain business. We must never pay commissions or fees to dealers, distributors, agents, finders, or consultants that are used as a bribe or kickback.

As a U.S. based business, many laws apply to Accelint both inside and outside the U.S. Among these are laws that:

- *Ensure companies do not cooperate in any way with unsanctioned boycotts;*
- *Restrict trade with certain countries or persons;*
- *Prohibit dealings that could aid terrorists or organizations that support terrorists; and*
- *Require that transactions are not being used for purposes of money laundering.*

To mitigate the risk to Accelint in conducting business internationally, Accelint has specific policies and procedures in place for conducting business internationally.

### **Trade Compliance**

Accelint is committed to complying with the laws and regulations that restrict or prohibit business or trade with certain countries, entities, or individuals. These laws and regulations include U.S. trade restrictions, import and export controls, and anti-boycott laws, as well as trade restrictions and import and export controls enforced by other countries where Accelint conducts business or the United Nations.

Accelint may be subject to these restrictions due to our involvement in transactions connected with the U.S. or their affiliation with Accelint. For example, using U.S. Financial Institutions (e.g. banks), routing paperwork through the U.S. for processing, or receiving help from a U.S. citizen located anywhere in the world may be sufficient involvement for these restrictions to apply.

U.S. laws and regulations prohibit or restrict certain dealings with designated persons/parties and entities controlled by or otherwise associated with sanctioned countries, persons, or parties engaged in sanctioned activities, such as terrorism, narcotics or human trafficking, and the manufacture and/or distribution of weapons.

You must:

- Comply with import and export laws and regulations associated with the countries in which we do business.
- Be aware that the laws of more than one country may apply in cross-border transactions.
- Ensure that anything intended for import or export is properly classified in advance, based upon the country of origin, the destination, the end use and the end user – secure all required documentation, labeling, licensing, permits, and approvals.
- Not conduct business with countries subject to U.S. or other applicable trade embargoes or economic sanctions.
- Not participate in boycotts that the U.S. does not support – if you receive requests to comply with a boycott or supply boycott related information, contact Accelint management.
- Do your part to ensure the integrity of our supply chain by communicating our trade compliance policies to parties conducting business on Accelint's behalf.

Violations of trade laws and regulations can result in the loss of import and export privileges, as well as civil and criminal penalties.

Trade compliance is a very complex area. When in doubt about trade regulations or policies, seek guidance from Accelint management.

### **Loans**

With the exception of common business transactions with banks or other financial institutions, employees may not make loans to or borrow from individuals or organizations that do business with Accelint.

### **Fraud and Misrepresentations**

Never make false or deceptive claims to promote Accelint or its services. Accelint's employees must not engage in or permit any activities that involve fraud or misrepresentation(s) regarding any aspect of Accelint's business. Also, as noted above in this Code of Conduct and in Accelint's Employee Handbook and the Anti-Fraud, Bribery & Corruption policy, Accelint employees have a duty to report such concerns.

### **Insider Trading**

Persons who possess material, non-public information concerning Company business or that of Accelint customers, suppliers, vendors, business partners, or competitors may not trade in the Company's securities or those of such customers, suppliers, vendors, business partners, or competitors nor reveal the information to anyone (or provide trading "tips" based upon such information) until the information has been effectively disclosed to the public. These prohibitions are based on federal securities laws, and as used in those laws, "material" information is information that a reasonable investor likely would consider important in deciding to purchase or sell a security and that could affect the price of the security.

### **Anti-Kickback**

Accelint strictly prohibits any form of kickbacks in connection with its business operations. In accordance with the Anti-Kickback Act of 1986, employees, officers, agents, and subcontractors are prohibited from offering, providing, soliciting, or accepting any money, fee, commission, credit, gift, gratuity, or anything of value, directly or indirectly, for the purpose of improperly obtaining or rewarding favorable treatment in connection with a prime contract or subcontract with the U.S. Government.

### **Antitrust Laws**

Antitrust laws prohibit business practices that restrain fair trade, such as price-fixing conspiracies, corporate mergers that weaken the competitiveness of a market, and predatory practices designed to achieve and/or maintain monopoly power. Accelint strictly complies with antitrust laws.

The following are common types of Antitrust Violations:

- **Price Fixing** - Price fixing is an agreement among competitors to agree on prices for their goods or services. This restricts price competition and is against the law. Price fixing can take different forms. Competitors do not have to charge exactly the same price, and not every competitor in an industry must join the conspiracy.
- **Bid Rigging** - Through bid rigging, conspiring competitors can manipulate prices in a competitive bid situation. Competitors agree in advance who will submit the winning bid on a contract. Just as with price fixing, it is not necessary that all bidders participate in the conspiracy.
- **Market Division** - In market division or allocation schemes, competitors agree to divide markets by customers, products, or territories.

## **Internal Monitoring and Risk Assessments**

Accelint maintains an ongoing system of internal monitoring and risk assessment to ensure compliance with applicable laws, regulations, and company policies. Consistent with expectations under FAR 52.203-13, the Company adopts a risk-based approach to identify, assess, and mitigate compliance risks associated with its operations and government contracting activities.

## **Allowable Costs**

Accelint shall ensure that all costs charged to Government contracts are allowable, allocable, and reasonable in accordance with applicable laws, regulations, and contract terms, including FAR Part 31.

Accelint shall not charge to Government contracts any costs that are expressly unallowable under FAR 31.205 or other applicable regulations. Such costs must be identified, segregated, and excluded from any billing, claim, or proposal applicable to a Government contract.

## **CONFLICTS OF INTEREST**

### **Primary Employment**

If you are a full-time employee, we expect you to consider Accelint to be your primary employer. Any outside employment or business activities must be secondary to your position at Accelint. Whether or not your employment with Accelint is full time, you must refrain from engaging in activities outside the scope of your employment if such activities would detract from, or interfere with, the fulfillment of your responsibilities as an employee of the Company.

Exercise caution when developing independent business opportunities with other companies. Contact a member of management or HR if you have questions about your individual business relationships with other companies.

### **Personal Conflicts of Interest**

As an employee of Accelint, it is important not to place yourself in a position in which your actions or personal interests are, or are reasonably likely to be perceived to be, in conflict with the interests of the Company. A conflict of interest occurs when you advance a personal interest at the expense of Accelint's interests. It is up to you to avoid any activity that creates, or appears to create, a conflict between your personal interests and the interests of Accelint.

Employees may refer to the Conflict of Interest Policy for additional guidance on identifying and reporting personal conflicts of interest. If there is any doubt about a potential conflict, you should speak with HR or someone in senior management.

### **Restrictions on Conducting Similar Business**

Accelint employees must have prior written approval of management to engage in the same or similar lines of business as conducted by Accelint while employed by Accelint; or volunteer at or work for another entity (company, firm, business) that conducts the same or similar business as Accelint. This includes serving on the board of directors or similar advisory board of an entity (company, firm, or business) that either does business with Accelint or that competes or could reasonably compete with Accelint.

## Organizational Conflicts of Interest (“OCI”)

An OCI may result when factors create an actual or potential conflict of interest on a contract, or when the nature of the work to be performed on the contract creates an actual or potential conflict of interest on a future acquisition. In the latter case, some restrictions on the future activities of Accelint may be required. Following are some examples of types of OCI’s:

- **Biased Ground Rules** – May occur when the contractor has input into setting the ground rules for a competition in which it (or an affiliate) may participate, for example:
  - Contractor helps Government write the Statement of Work or other specifications for an upcoming procurement.
  - Contractor has the ability to specify goods or services that can only be provided by themselves (or an affiliate).
- **Unequal Access to Information** – May occur when a contractor has access to nonpublic information that may provide it with a competitive advantage in future competitions, for example:
  - Contractors in the course of their work gains access to financial or technical information related to competitors.
  - Contractor gains access to Government needs or procurement strategies.
- **Impaired Objectivity** – Involves situations where a contractor’s work under one contract could entail evaluating itself, a related entity, or a competitor. Also occurs where a contractor could have the ability to steer work to itself or a related company or away from a competitor. Examples:
  - Contractor has responsibility for determining where particular work is conducted.
  - Contractor does quality assurance/quality control on an affiliate or competitor.
  - Contractor provides administrative personnel in procurement sensitive areas (e.g. overhearing procurement discussions).

Accelint’s employees may refer to the Accelint Conflict of Interest Policy for additional guidance on identifying and reporting Conflicts of Interests, including OCIs.

## Restrictions on Endorsements

Accelint employees may not endorse any product, service, or organization on behalf of Accelint unless specifically authorized by an authorized official of the Company.

## GOVERNMENT CONTRACTING

Accelint values our government customers and recognizes that the laws and regulations associated with serving them are generally more complex and stricter than those for our commercial customers. We have highlighted some of the more common areas within other sections of this Code of Conduct (i.e., Conflicts of Interest, Gifts and Gratuities, Regulation and Competition, etc.). Accelint is absolutely committed to complying with the requirements of applicable Federal Acquisition Regulations and all other relevant laws and regulations when conducting business with the U.S. Government.

We promote procurement integrity by, among other things:

- Not allowing gifts of any kind or value with federal government employees.
- Never attempt to obtain or use: 1) government confidential information, or source selection information or 2) other contractor’s nonpublic bid or proposal information, such as costs, pricing, or proprietary information.

- Not discussing job or business opportunities with current or former government officials or employees, military personnel or their family members unless properly authorized by Accelint.
- Ensuring that all information submitted in government contract proposals and negotiations is accurate, complete, and current.
- Ensuring that we fully comply with all requirements for each federal government contract we have, and report complete and truthful information about our performance on a federal government contract when required or requested.
- Ensuring that we account for our hours, expenses, and costs in accordance with all federal government contracting laws and regulations.
- Ensuring that our subcontractors are qualified and understand that there are requirements in our federal government contracts applicable to their subcontract with Accelint, including their agreement to abide by Accelint's Code of Conduct and applicable Policies and Procedures. Accelint shall ensure that all applicable contract requirements are properly flowed down to subcontractors in accordance with federal regulations, including FAR 52.203-13, FAR 52.244-6, FAR 52.212-5, DFARS 252.204-7012, and, where applicable, DFARS 252.244-7000.

Accelint employees must understand and appreciate that violations occurring in serving federal government agencies bear substantial penalties. In addition to criminal prosecution, civil penalties, and fines, any federal agency can suspend or debar Accelint from **ALL** federal government contracting (not just with the agency at issue). The decision to suspend or debar an organization from federal government contracting is essentially an issue of trust – can that agency trust you to do business with them? We must never take any action(s) that violates the trust that we have earned and honor the federal government customers Accelint serves. Employees may refer to this Code of Conduct, the Accelint Employee Handbook, and their supervisor for guidance and expectations when working on government contracts.

### **U.S. Government Classified Information**

Security regulations that govern and/or relate to the protection of government classified information are complex and vary by government agency/department. Accelint is required to properly safeguard and control access to all government information that is classified for protection and is in our possession. Each Accelint employee, as well as our subcontractors, consultants, and visitors, must familiarize themselves with all applicable security regulations/requirements and hold applicable clearance(s) prior to gaining access to classified information.

For security assistance and information, please contact your Facilities Security Officer ("FSO"). If you have any questions about the laws or regulations that may affect government contracting work you do on behalf of Accelint, please contact your supervisor or HR.

### **Whistleblower**

A whistleblower is an employee who reports suspected illegal or dishonest activity, such as legal violations or fraudulent financial reporting. Employees should report concerns to their supervisor, HR, or anonymously through All Voices. Confidentiality will be maintained as much as possible, though disclosure may be required for investigation or legal reasons. Accelint prohibits retaliation against whistleblowers consistent with applicable law, including 41 U.S.C. 4712, which provides protections for employees of federal contractors who disclose evidence of gross mismanagement, gross waste of funds, abuse of authority, or violations of law related to a federal contract or grant. Employees who believe they are being retaliated against must contact HR immediately.

See the Accelint Handbook for additional Whistleblower information.

### **Controlled Unclassified Information (CUI)**

As defined in 32 CFR Part 2002, CUI is information the Government creates or possesses, or that an entity creates or possesses for or on behalf of the Government, that a law, regulation, or Government-wide policy requires or permits an agency to handle using safeguarding or dissemination controls. Accelint is required to comply with DFARS 252.204-7012 and the standards for assessing, disseminating, handling, and safeguarding CUI. Each Accelint employee, as well as our subcontractors, consultants, must familiarize themselves with the CUI regulations and adhere to any agency guidance provided with regards to the CUI that they are given access.

### **FAR Mandatory Disclosure Rule**

Contractors must timely disclose to the affected federal government agency's Office of Inspector General and Contracting Officer whenever, in connection with a contract award, performance, or closeout of a contract, the contractor has credible evidence that a principal, employee, agent, or subcontractor has committed certain crimes or engaged in certain misconduct. To not do so is a crime itself, and subjects the contractor to numerous and severe penalties, including possible prosecution and suspension/debarment from federal government contracting.

It is Accelint's responsibility to make such disclosures and to report any violation of federal criminal law involving fraud, conflict of interest, bribery, or gratuity violations, or violation of the civil False Claims Act (31 U.S.C. §§ 3729–3733). Therefore, it is imperative and required that you report any suspected fraud, waste, abuse, or misconduct to HR, or a member of Accelint's Management immediately. You may also use our reporting platform to report such concerns. Your concerns will be investigated in accordance with Accelint's policies and, if required, disclosure will be made to the affected federal government agency.

### **Truthful Cost or Pricing Data Act (41 U.S.C. chapter 35)**

Accelint must comply fully with the Truthful Cost or Pricing Data Act (previously referred to as TINA) in the conduct of its U.S. Government business. The purpose of this act is to give the Government an effective means of negotiating a fair and reasonable price. It requires disclosure of cost or pricing data and certification that such data are accurate, complete, and current. Employees involved in negotiating Government contracts and subcontracts must ensure that all cost and pricing data, communications and representations of fact are accurate, complete, current, and truthful.

### **Third-Party Vetting and Due Diligence**

Accelint is committed to conducting business only with third parties that demonstrate integrity, legal compliance, and alignment with ethical standards. All third parties, including subcontractors, consultants, agents, suppliers, distributors, and joint venture partners, must undergo appropriate risk-based vetting prior to engagement and periodically thereafter.

### **Hiring Practices Involving Current or Former Military/Federal Employees**

Special restrictions apply to hiring or retaining a government or former government employee (including military officers) as an employee or consultant of the Company. To ensure that you do not violate any of these restrictions, contact HR for advice before discussing the possibility of employment with any government official.

Authorization from the CEO must be obtained before entering any talks relating to proposed employment with current government employees. In addition, any plans to employ retired military officers of general or flag rank, or civilian officials having the rank of Deputy Assistant Secretary or above, must be approved in advance by Accelint's CEO. Employees may refer to Accelint's Conflict of Interest Policy for additional guidance.

### **Compliance With All Applicable Laws and Regulations**

Violating the law can have a devastating and lasting effect on the persons involved, as well as Accelint. Employees who break the law, such as, for example, the False Claims Act, may be subject to disciplinary action, including termination. They may also subject themselves individually, as well as Accelint corporately, to criminal and civil liability, fines, a compromised record, and possible imprisonment.

For government clients served by Accelint, violating the law or certain regulations may result in Accelint's suspension or debarment from all federal contracting or contracting with a particular client. One person's misconduct puts all Accelint, and its employees, at risk. Therefore, all Employees are required to abide by Accelint's policies and procedures in this Code of Conduct, the Accelint Employee Handbook and division Employee Handbook. **WE TRUST OUR EMPLOYEES WILL DO THE RIGHT THING.**

## **PROTECTING ACCELINT INTELLECTUAL PROPERTY**

Every employee of Accelint has a fiduciary relationship to Accelint. All information relating to the internal operations of the organization is strictly confidential. Employees may refer to the Accelint Employee Handbook for additional guidance on protecting Accelint's intellectual property and inventions.

### **Private Information**

Accelint respects the legitimate privacy interests of its employees and complies with laws regarding releases of personnel information. Such information may include but is not limited to, medical and insurance records; benefit information; personnel files; discipline reports; employment agreements; drug test reports; credit and criminal checks; and disability and accommodation information and requests. Employees may refer to Accelint's privacy and confidentiality policies in the Accelint Employee Handbook and Employee Privacy Policy.

### **Intellectual Property**

All designs, inventions, techniques, or other intellectual property created by Accelint employees during their employment are considered "work for hire" that belongs to Accelint. Accelint owns the rights, titles, and privileges that accompany the authorship of intellectual property, including the right to copyright, publish, copy, and make derivative works of that property.

### **Trade Secrets**

A trade secret is information that gives Accelint an advantage over its competitors. Trade secrets can be formulas, patterns, devices, programs, methods, techniques, processes, or compilations of information that are valuable because only Accelint knows about them. If another organization or individual learns about a trade secret, it loses its value as a source of competitive advantage. Trade secrets are legally protected and Accelint can pursue action against parties that try to obtain them. Therefore, employees who know Accelint trade secrets must take steps to protect them.

## **Regulation and Competition**

Fair competition is the basis of the private enterprise system, and Accelint supports laws that ensure equitable competition in the markets we serve. Through our business practices, we strive to increase sales by providing the best possible quality, price, service, and value to our clients, and not through any questionable means. We know that quality work, reasonable prices, and excellent service will help us to continue our success and growth. Employees should be aware of the laws and regulations that govern competition, so they can help maintain Accelint's fair business practices and reputation as a fair market competitor.

## **SAFE, HEALTHY, PRODUCTIVE WORK ENVIRONMENT**

We strive to create and maintain a work environment in which people are treated with dignity, decency, and respect and believe that everyone has the right to work in a professional atmosphere that promotes equal employment opportunities and prohibits bullying and discriminatory practices, including harassment. Accelint's work environment should be characterized by mutual trust and the absence of intimidation, oppression, and exploitation.

Other prohibited conduct, because of its adverse impact on the work environment, includes the following:

- Threats or violent behavior.
- Possession of weapons on Accelint premises (See Employee Handbook).
- A manager having a romantic relationship with a subordinate.
- Discrimination against any employee based on any protected characteristic.
- Attendance at work while under the influence of alcohol or drugs is strictly forbidden, except where these drugs are prescribed by a doctor for medical purposes (See Employee Handbook).
- Consumption of alcoholic beverages on Accelint's premises, unless as a part of a company sponsored event.

Accelint's employees may refer to the Accelint Employee Handbook for additional guidance.

### **Safe Work Environment**

We are committed to a safe, healthy, and violence-free work environment. Behavior that poses risk to the safety, health, or security of Accelint employees, our extended workforce, or visitors is prohibited. If you become aware of a risk to the safety, health, or security of our workplace, you should notify your supervisor or any member of management immediately. To be able to respond effectively, Accelint needs to know about such actions as soon after they occur as possible. However, if it is an emergency or life-threatening situation, first contact emergency services by dialing 911, and then notify an Accelint official.

Accelint prohibits discrimination, harassment—verbal, physical, or visual, as discussed more fully in Accelint's Employee Handbook. If you believe you have been bullied, harassed, or discriminated against by anyone at Accelint, or by an Accelint partner, vendor, or affiliate, we strongly encourage you to immediately report the incident to your supervisor, HR, or both. Similarly, supervisors and managers who learn of any such incident should immediately report it to HR. HR will promptly and thoroughly investigate any complaints and take appropriate action.

### **Drug-Free and Alcohol-Free Workplace**

Employees are required to report to work in appropriate mental and physical condition to perform their jobs in a satisfactory manner. All employees are accountable for maintaining a drug-free and alcohol-free workplace. Compliance with this policy is a condition of continued employment. All employees are expected to comply with the Drug free and Alcohol-free Workplace policy contained in the Accelint Employee Handbook.

### **Employee Conduct and Disciplinary Action(s)**

As stated earlier, this Code of Conduct provides guidelines for employee conduct. However, please keep in mind that as an Accelint employee, you are always responsible for your own conduct. This includes your behavior while traveling on company business.

Accelint will address violations of this Code of Conduct, the Accelint Employee Handbook, and any other violations of Accelint policies and procedures on an individual basis. Pursuant to its at-will employment policy, Accelint reserves the right to impose whatever forms of discipline it chooses in a particular instance. Disciplinary action may include an oral or written warning and/or reprimand, suspension with or without pay, demotion, or termination (including immediate termination). A negative performance evaluation will count as a written warning. There is no standard series of disciplinary steps Accelint must follow. In certain circumstances, the employee's conduct may lead to immediate discharge. Employees who have had formal written warnings are not eligible for salary increases, bonus awards, promotions, or transfers during the warning period.

### **Social Media Usage**

Accelint supports the usage of social media by our employees, but we expect that each employee act responsibly and in accordance with this Code of Conduct, Accelint Employee Handbook, and Accelint's Social Media Policy.

### **Information System and Equipment**

Accelint supplied office equipment and electronic communications systems (including its computers, websites, internet connections, cell phones, handheld portable electronic communications devices, telephone and fax systems) are for Accelint's business and may not be used for personal needs, except on an incidental and occasional basis that does not interfere with an individual's job performance or otherwise violate Accelint's policies. Under no circumstance may Accelint's property be used for advertising, promotion, or solicitation of business other than for Accelint.

Employees should refer to the Accelint Employee Handbook and IT Acceptable Use Policies for more information about Accelint's policies for safety and using company property.

# ACKNOWLEDGMENT

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*I have received and read a copy of Accelint's Code of Conduct and understand that the policies and rules described in it are subject to change at the sole discretion of Accelint at any time. I understand that my signature below indicates that I have read and understand the above statement and that I have received a copy of Accelint's Code of Conduct.*

Employee's Printed Name: \_\_\_\_\_

Employee's Signature: \_\_\_\_\_

Date: \_\_\_\_\_

The signed original copy of this acknowledgment will be filed in your personnel file.