



ARKA

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**CODE OF BUSINESS  
ETHICS & CONDUCT**

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# A MESSAGE FROM THE PRESIDENT

Dear Colleagues,

Our continued success as a world-class innovator in space and defense is driven by our commitment to our core values: integrity, mutual trust and respect, doing the right thing and mission success. Fostering a work environment that reflects these values is integral to how ARKA does business and what our customers, business partners and suppliers have come to know and expect.

ARKA's Code of Business Ethics & Conduct establishes clear standards and expectations for all business-related activities. It is more than a policy; it is foundational to everything we do at ARKA, from decision-making, to collaborating with each other, to engaging with external stakeholders. It is imperative that each of us embodies these core values, both in the workplace and when representing the company at business meetings, conferences and events.

It is also important that employees feel empowered to come forward with questions or concerns about potential misconduct. We are committed to a workplace where open communication is encouraged, and take all reports made in good faith seriously.

As a trusted partner for over 60 years, we know that our steadfast pledge to uphold the highest standards of integrity and compliance will secure our position as a world leader in space, ground, transport and analytics for the most critical missions for decades to come.

Thank you for your commitment to the company, our customers and business partners, and for exemplifying our core values each and every day.

Sincerely,

**Andreas Nonnenmacher**  
**President, ARKA Group, L.P.**





# ARKA CORE VALUES

## Our Core Values

Our core values define how we conduct business, guide the way we treat our customers, partners and each other, and shape our vision of success as a company. Reflect on our core values if you ever wonder what is the right action to take.

### Always Acting with Integrity and Doing What's Right

We do the right thing, the right way, every day. Our commitment to conduct business honestly, ethically and in compliance with legal requirements remains constant. Obeying both the letter and the spirit of the law is one of the foundations of our Code. Team Members are expected to understand the regulatory environment within which ARKA operates well enough to know when to seek advice from managers or the Legal Department.

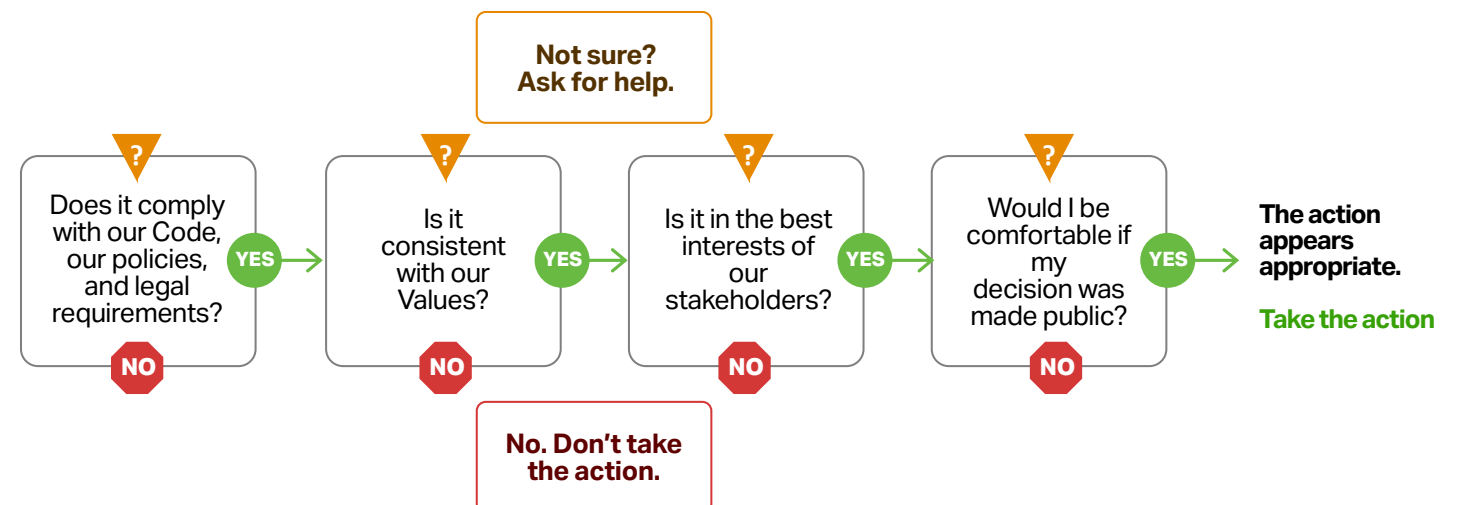
### Building Mutual Trust and Respect

ARKA provides a supportive work environment where Team Members have the opportunity to reach their full potential. Sharing and valuing a wide range of viewpoints and ideas broaden our perspectives, inspire innovation and empower us to achieve our goals.

Our work also requires that we protect our confidential and proprietary information, as well as the intellectual property of others. We will respect and honor our hard work and the work of others by protecting these assets appropriately.

### Performing to Ensure Mission Success

The Company strives to outperform its competition fairly and honestly. Advantages over the Company's competitors are to be obtained through superior performance of the Company's solutions and services, rather than unethical or illegal business practices.



# WE RELY ON OUR CODE

**Our Code** helps us perform our work consistently with our values. It guides us toward sound decisions and assists us in maintaining the trust we have built with our team members, customers and business partners. We understand this trust is essential for the continued success of our business.

## What is our Code?

Our Code of Business Ethics and Conduct (this “Code”) describes the most important rules and policies that help ARKA Group, L.P. and each of its business units, offices, locations and subsidiaries (individually and collectively referred to as the “Company” or “ARKA”) maintain a lawful, honest and ethical environment throughout all of our activities. It is the core of our culture and compliance program and reflects our commitment to follow the highest standards of ethical and legal conduct.

## Our Shared Responsibilities

The rules and policies set forth in this Code apply to all Executives, Directors, Employees and Team Members. They also apply in certain respects to business partners, such as suppliers and consultants.

All Team Members are required to read the Code carefully. Each rule and policy is important because even inadvertent or unintentional violations of our Code may have serious consequences for ARKA and any individual involved in the violation.

In addition to our Code, ARKA has other important policies and procedures, many of which provide detailed guidance about subjects covered by our Code. Some of those policies are cross-referenced in this Code, and they are always available to employees in [PolicyTech](#).

This Code and our other policies and procedures may be amended and/or replaced from time to time. If there is any inconsistency between this Code and local law, local law will prevail.

The following pages highlight the laws, rules and regulations by which ARKA abides. If you have questions about this Code or a specific rule or policy, contact your Human Resources Department, which will consult with the Chief Legal Officer or the Associate General Counsel for guidance as necessary or appropriate. If you are an Executive or Director, please contact the Chief Legal Officer for all such questions.

### We Avoid Conflicts of Interest

Acting with integrity means not letting personal interests affect the business decisions we make on behalf of ARKA.

#### What is a Personal Conflict of Interest?

A personal Conflict of Interest may exist if a family, business or personal relationship affects or could potentially affect your business judgment.

Each Team Member has a primary business responsibility to ARKA and is expected at all times to work in the best interests of the Company.

Team Members must avoid all conflicts between the best interests of the Company and individual personal relationships or interests. Even the appearance of a Conflict of Interest can have a negative influence in the minds of co-workers, customers, suppliers, shareholders and the public.

### TOOLS AND RESOURCES

#### ARKA's Conflict of Interest Policy

#### We Disclose Potential Conflicts of Interest

If a personal activity, investment, interest, relationship or association could compromise – or even appear to compromise – your judgment, you are required to promptly disclose, in writing, the conflict. In some cases, disclosure may be all that is required. In others, the situation may require additional action to avoid or mitigate a conflict.

Certain ARKA Team Members who directly or indirectly provide services to government customers may be required to complete a Disclosure of Interest Form identifying their interests and the interests of close family members and other members of their household. You will be contacted if you need to complete a Disclosure of Interest Form.

New Team Members must complete the Employee, Executive and Director Certification (the "Certification") at the end of this Code upon becoming an ARKA Team Member and on an annual basis thereafter.

Certifications should be signed and submitted to the Legal Department via PolicyTech.

### Common Conflict of Interest Situations

We have listed certain activities and interests that reflect actual or potential Conflicts of Interest, which should be disclosed. It is impossible to describe every potential Conflict of Interest, so Team Members must exercise good judgment, seek advice when appropriate, and adhere to the highest ethical standards in their professional and personal affairs.

#### Family and Friends

- Arranging or facilitating business transactions between any relatives and ARKA, or between any relatives and any customer or supplier of ARKA.

*Example: You are responsible for procuring materials from a new supplier owned by your brother. The relationship with your brother creates a Conflict of Interest because he owns the business that is supplying to ARKA.*

#### Financial Interests

- Having a financial or management interest in customers, suppliers, competitors, or any enterprise that is known or believed to have a business relationship with ARKA may present a conflict. A financial interest need not be disclosed if it involves < 1% of the stock of a publicly held company unless it is a significant portion of the net worth of the Team Member.
- Soliciting or accepting money for personal benefit from a current or potential supplier, customer or competitor.

#### Outside Business Activities

- Competing with the Company.
- Maintaining concurrent employment with ARKA and any other organization. Employees must disclose all other employment.
- Serving on the board of directors or similar body of a for-profit enterprise or government agency.

ARKA has established procedures to review all disclosures of potential personal Conflicts of Interests to ascertain whether a Conflict of Interest actually exists. If one exists, the Company will work with the Team Member to determine what additional actions, if any, are required to be taken by the relevant individual and/or the Company.

### Is It a Conflict? Ask Yourself:

#### If I take this course of action:

- Will I feel obligated to someone else?
- Am I acting inconsistently with ARKA's values?
- Is there a chance that my independent judgment could be compromised?

#### Could it give the appearance of impropriety or divided loyalty?

If you answer **"yes"** to any of these questions, a real or perceived Conflict of Interest may exist and must be disclosed.

To report a perceived Conflict of Interest, log into [arka.ethicspoint.com](https://arka.ethicspoint.com) from a computer, or [arkamobile.ethicspoint.com](https://arkamobile.ethicspoint.com) from your mobile phone, or call 833-590-0845 (US) or 0800-066-8970 (UK).

### Organizational Conflicts of Interest ("OCI")

In determining whether to award a contract to ARKA, government customers may consider whether ARKA has conflicting roles that would bias its judgment in performing the contract or provide an unfair competitive advantage.

There are three types of OCI:

- 1 Unequal Access to Information:** If Team Members have access to non-public information acquired while performing a government contract.
- 2 Biased Ground Rules:** If you have worked with the government to establish rules that could skew the competition for a government contract in ARKA's favor.
- 3 Impaired Objectivity:** If a government contract would involve the evaluation of products or services, the Company may not be able to compete for that contract if it would be in a position to assess its own products or services, without approved safeguards.

*Example: If you receive access to a competitor's proprietary data as part of ARKA's performance of a contract, you may have to avoid disclosing that data to others or using that data in other contract proposals.*

*Example: If you assisted the government in identifying requirements or developing a statement of work, ARKA may not be able to compete for a contract for the resulting services.*

*Example: If ARKA is called upon by the government to evaluate goods or services provided by itself or an affiliate, or to make recommendations concerning programs where its own financial interest is at stake – thus potentially compromising the objectivity of the advice the government has paid for – there may be an OCI.*

If you are aware that a completed, ongoing or potential contract might create an actual or apparent Conflict of Interest with work on another completed, ongoing or potential contract, you should bring the issue to the attention of your supervisor, who will review it with the Chief Legal Officer, or bring it directly to the Chief Legal Officer.

If you are involved in responding to a request for proposal or entering into a contract that contains an OCI provision, including any provision that references FAR 9.5, you should contact the Legal Department. The Legal Department is responsible for conducting an OCI review before submitting a proposal or signing a contract. Should an OCI mitigation plan be put in place, you are required to comply with that plan and report any violations of the plan to the Chief Legal Officer.



### Corporate Opportunities

Each Team Member owes a duty to our Company to advance ARKA's legitimate business interests when opportunities arise. We are prohibited from taking personally (or directing to a third party) a business opportunity that is discovered through the use of Company resources, property, information or job positions, unless the Company consents to an individual's personal pursuit of the opportunity. More generally, you are prohibited from competing with the Company or using ARKA's property, information, resources or positions for personal gain.

### Political and Other Outside Activities

Prior to seeking election or appointment to public office, Team Members must notify their supervisor, who will work with the Chief Legal Officer to clarify the Company's position in the event the candidacy is successful. Prior written approval of the President of ARKA must be obtained.

Subject to the limitations imposed by this Code, each Employee and Executive is free to engage in outside activities that do not interfere with the performance of their responsibilities or otherwise conflict with ARKA's interests. Where activities may be of a controversial or sensitive nature, Team Members are expected to seek the guidance of their supervisor or the Human Resources Department before engaging in such activities. No Team Member may use their Company position or title or any Company

equipment, supplies or facilities in connection with outside activities, nor may any Team Member do anything that might infer support by the Company of such activity, unless approved in writing by the Chief Legal Officer.



## TOOLS AND RESOURCES

### ARKA's Conflict of Interest Policy

### Prohibition Against Kickbacks

Offering, providing, attempting to provide, soliciting or accepting any Kickbacks, or including any Kickbacks in a subcontract or contract for commercial or government business, whether domestic or international, is prohibited. Kickbacks are illegal and unethical.

Whether you are working on a government or commercial program, you are required to promptly report any evidence of a Kickback, attempted Kickback or suspected violation of this policy, to the Chief Legal Officer immediately. All reported violations will be investigated immediately and appropriate action taken.

Team Members dealing with the U.S. Federal Government also need to be aware of the Federal Anti-Kickback Act, which imposes criminal penalties for making or receiving a prohibited payment. Additionally, each prime contractor or subcontractor is required to promptly report a violation of the Federal Anti-Kickback Act to the appropriate Inspector General or the U.S. Department of Justice, if the contractor has reasonable grounds to believe that a violation has occurred.

ARKA will distribute a notice to its vendors on an annual basis emphasizing: ARKA's commitment to the highest standards of business ethics; ARKA Team Members should not be favored with any gifts or items of value; ARKA Team Members are forbidden from soliciting or accepting gifts or items of value; and the contact information for reporting any suspected violations of this Code, whether by ARKA Team Members or vendor employees.



*Fifteen federal employees and contractors pled guilty to a criminal conspiracy in which a network of contractors agreed to pay bribes to federal employees to win contracts. Jail time and restitution were imposed, with a prison sentence of nearly 20 years for one participant.*

*John Winslett, of Bristol, Rhode Island, was sentenced to 70 months in prison followed by three years of supervised release for paying bribes to two U.S. Army contracting officials who worked at the Range at Schofield Barracks, to steer federal contracts to his employer, a government contractor. The bribes included cash and firearms.*



### We Give and Receive Appropriately

We recognize that the exchange of gifts or entertainment may help develop and strengthen our business relationships, but we do not give or receive gifts or entertainment that influence or even appear to influence business decisions. We give and receive gifts or entertainment in an ethical way that does not violate our Code.

Team Members should not engage in any actions that gain an unfair advantage in making a sale to a customer. Such actions include, but are not limited to, offering payoffs, bribes, contributions, finders fees or compensation, in any form, (including sham consulting agreements); providing sexual or other favors; donations for subsidizing "social" events; and payment for personal travel, vacations, club membership, etc. to the customer's employees, consultants, prime contractors or others to influence specifications or evaluations, obtain restricted information or reward favorable treatment.

*Example: Our customer from a U.S. Government Agency will be onsite all day for a program review. Can I provide lunch to them, paid for by the Company?*

Modest refreshments but not meals can be provided, unless the government employees are told the value of the meal, and require contribution for payment of that value. See the ARKA Gifts and Entertainment Policy.



Additionally, ARKA can be held responsible for the illegal conduct of its representatives, consultants and agents. Team Members are prohibited from engaging individuals or other companies to act as agents or sales representatives for ARKA without prior approval by the Chief Legal Officer.

Team Members must become familiar with and follow the ARKA Gifts and Entertainment Policy. Under no circumstances are gifts of cash or cash equivalents permitted. If a gift is authorized by the Chief Legal Officer, the gift, recipient, value and date of the gift must be recorded in the Company's financial system.

## TOOLS AND RESOURCES

### ARKA's Gifts and Entertainment Policy



### Criteria for Acceptable Business Courtesies

- Not solicited or requested
- Not perceived to improperly influence a business decision
- Not offered or received while a sales or procurement decision is pending
- Not conditioned on obtaining a sales or procurement decision
- No personal benefit
- Infrequent
- Nominal value (not excessive or lavish)
- Not cash or cash equivalent (no gift cards or gift certificates)
- Occurs in an appropriate setting for business discussion
- Would not embarrass the Company
- Is lawful under applicable laws



*Example: A supplier offers you tickets to a sporting event. If you're interested in accepting the offer, you must disclose it to your manager before accepting.*

If the tickets have minimal value or are offered in connection with a hosted event at which business will be conducted, participation may be allowed.

If the offer has substantial value because the tickets are expensive, hard to obtain, or offered together with accommodations or other valuable items – and no business will be conducted – it is more likely that the employee will not be allowed to accept the offer.



### Political Activities and Other Contributions

The Company believes strongly in the democratic political process and encourages employees to participate personally on their own time in that process. A corporation's activities, however, are limited significantly by law. For this reason, no political contribution of corporate funds or use of corporate property, services or other resources, may be made without the written approval of the President of ARKA. Indirect expenditures on behalf of a candidate or elected official, such as travel, use of telephones and other corporate equipment, may be considered contributions and require preapproval. Any questions should be referred to the Chief Legal Officer or the Associate General Counsel. In no event shall an employee be reimbursed in any manner for political activities.

All requests for donations or contributions to agencies outside the Company must be referred to and approved by the President of ARKA.



### TOOLS AND RESOURCES

#### ARKA's Conflict of Interest Policy

### We Respect All

ARKA provides a supportive work environment where Team Members have the opportunity to reach their full potential. Our work environment encourages collaboration and inclusion. Sharing and valuing a wide range of viewpoints and ideas broaden our perspectives, inspire innovation and empower us to achieve our goals.

Our success depends on the development and use of Human Resources. We are committed to treating our team with dignity and respect.

### We Promote Equal Employment Opportunity

Your employment relationship is generally at-will and may be terminated by you or ARKA at any time, with or without cause, unless otherwise governed by local law. Nonetheless, all employment-related decisions are to be made without regard to such factors as age, race, color, religion, sex, sexual orientation, marital status, pregnancy, disability and national origin, among others. Retaliation against Team Members for reporting discriminatory conduct is prohibited.

Managers are expected to act with prudent business judgment in all aspects of the manager-employee relationship, including hiring, training, promotion, compensation, transfer and discipline. Managers are expected to keep their employees informed and carry out ARKA's philosophy of pay and advancement based on merit.

### We Prohibit Discrimination and Harassment

ARKA is committed to maintaining a work environment that is free of unwelcome conduct and all forms of harassment. We will follow all applicable anti-harassment and equal opportunity laws for employment. Harassment or unwelcome conduct may take a variety of forms including, but not limited to, sexual harassment, physical intimidation, ethnic jokes, racial remarks, religious intolerance, ridicule of different cultural and lifestyle practices, such as a person's sexual orientation, or other non-job-related factors. Such conduct will not be tolerated in our work environment. You are encouraged to communicate concerns about harassment or inappropriate conduct, sexual or otherwise, to the Human Resources Department.

*Example: In a recent meeting, a supplier told jokes that degraded a certain religious group. I found the jokes offensive, but everyone else was laughing. Am I being too sensitive? No, you are not being too sensitive. The Company does not tolerate disrespectful conduct from ARKA Team Members or business partners. You can report the incident to Human Resources or submit a concern in EthicsPoint.*

*Example: If a team member makes offensive jokes at an offsite dinner with a customer, does our Code apply? Yes, our Code applies to our work, even when we are offsite, such as on business travel and at business-related social activities.*



### Workplace Respect and Safety

Employee safety is one of our most important business requirements, and ARKA will comply with all health, environmental and workplace safety laws to ensure our employees can complete their work responsibilities without fear of injury or illness. In turn, all employees must abide by Company policies and procedures governing the health and safety of employees, customers, vendors and business partners.

Our core values of Trust and Respect also mean we will foster an inclusive work environment, support and embrace the differences in others and value the varying viewpoints and perspectives of Team Members. Intimidating or threatening behavior, bullying, vulgar language, and any form of violence are strictly prohibited.

*Example: I overheard a team member threaten another who is afraid to report the incident. What should I do?*

Immediately report the incident to your manager or Human Resources Department or submit a report at [arka.ethicspoint.com](https://arka.ethicspoint.com) or [arkamobile.ethicspoint.com](https://arkamobile.ethicspoint.com), or call 833-590-0845 (US) or 0800-066-8970 (UK).



### Employment Discussions with Current and Former Government Employees

ARKA takes seriously the federal statutes, regulations and agency standards of conduct that restrict the ability of former federal government employees to use their former positions for their own benefit or the benefit of others. As a result, no ARKA employee, unless specifically authorized by the Chief Legal Officer or delegate, may discuss the possibility of future Company employment (including consultant and independent contractor positions) with a current or former government employee that has been separated from government employment for less than one year.

The Chief Legal Officer will require you to obtain information about the timing and nature of the prospective employee's government work and about any contact the prospective employee had with ARKA in their government capacity and may grant approval for an offer of employment only after completing a review of this information.

In addition, you must report to the Chief Legal Officer any employment discussions initiated by a current government employee or a former government employee that has been separated from government employment for less than one year. It may be permissible to consider employing current government employees who initiate discussions with you and who have complied with all applicable federal rules concerning notification of plans to leave the government, but no employee may participate in such discussions without the written permission of the Chief Legal Officer.



Employees who are former officers or employees of the U.S. Federal Government or other government entities or agencies are responsible for complying with all applicable post-retirement or post-employment restrictions established by statute or regulation. All such employees must notify the Chief Legal Officer of any such restrictions before starting work with ARKA.



### **We Respect Restricted & Internal Use Only Information**

One of ARKA's most important assets is its confidential information. If you have received or have access to confidential information, you must keep this information confidential. Confidential information may include research, development, technical or engineering information, business, marketing, financial information, personnel data and similar types of information provided to the Company by its customers, suppliers and partners.

In addition, because we interact with other companies and organizations, there may be times when you learn confidential information about other companies before that information is available to the public. You must treat this information in the same confidential manner as you are required to treat ARKA's own confidential and proprietary information. Furthermore, there may be times when you must treat as confidential our interest in or involvement with another company or government organization.

This Code requires you to refrain from discussing confidential or proprietary information with outsiders, and even with other Team Members, unless those Team Members have a legitimate need to know the information to perform their job duties. For outsiders, a confidentiality agreement must be in place with the Company. If a Team Member leaves the Company, he or she must safeguard and return confidential information in his or her possession and may not copy, take or retain any documents containing proprietary information.

Inventions, ideas, concepts, etc., relating to the Company's business that are conceived or made during a Team Member's employment are the property of ARKA. Unauthorized use or distribution of this information could be illegal and result in civil liability and/or criminal penalties. Unauthorized posting or discussion of any information concerning ARKA's business, information or prospects on the internet is prohibited unless approved through the public release process.

You may not discuss ARKA's business, information or prospects on any social media site, website, blog, chat room or forum regardless of whether you use your own name or a pseudonym.

Privacy laws such as Data Protection Act 2018 and the EU and UK General Data Protection Regulations (GDPR) require ARKA and its employees to safeguard personally identifiable information pertaining to ARKA's Team Members (e.g., salary, bonus or performance-appraisal data), customers or other individuals (e.g., names, addresses, telephone numbers and social security numbers). You must be familiar with and adhere to the privacy laws in the countries in which we operate, any privacy notices in place, and where applicable, data breaches must be immediately reported to the Data Protection Officer.

You must be extremely cautious when discussing sensitive information in public places like elevators, airports, restaurants and quasi-public onsite areas, such as cafeterias.

All ARKA emails, voicemails and other communications are confidential and should not be forwarded or otherwise disseminated outside of the Company, except where required for legitimate business purposes or for employee benefit information forwarded to your personal email account for personal purposes.

### Government Classified and Sensitive Information

When working with the government, you must comply with government and ARKA security requirements and prevent and report unauthorized access or dissemination of classified and sensitive unclassified material or information to the Facility Security Officer.

In addition to the above responsibilities, if you are handling information protected by any privacy policy adopted by the Company that may be applicable to such information, you must handle that information solely in accordance with the applicable policy.

Team Members' rights, responsibilities and obligations regarding confidential information and intellectual property are more fully defined in the Employee Proprietary Information and Invention Assignment Agreement between ARKA and each of its Team Members.

### Public Release of Information

Team Members are expected to keep confidential all proprietary and non-public information unless and until that information is released to the public through approved channels (usually through a press release or a formal communication from a member of senior management). For more information on the release of information to the public and the process for approval, including the public release of white papers and presentations, you can contact ARKA's Associate Director of Corporate Communications.



*Example: I emailed the wrong report to a supplier. The report contained another supplier's confidential information. I asked the supplier to delete the email, should I do anything else?*

Yes, you should seek guidance from your manager and submit a report to [arka.ethicspoint.com](https://arka.ethicspoint.com) or [arkamobile.ethicspoint.com](https://arkamobile.ethicspoint.com), or call 833-590-0845 (US) or 0800-066-8970 (UK). In the UK, contact executive management regarding potential data privacy reporting obligations.



### We Protect Our Reputation

ARKA discloses Material Information concerning the Company to the public only through specific limited channels to avoid inappropriate publicity and to ensure that all those with an interest in the Company will have equal access to information.

You must be sensitive to situations in which disclosure of non-public information may occur, such as business meetings or unrelated social situations. Communicating Company information to journalists, analysts, consultants, Government officials and other third parties is public disclosure, even if disclosed to only one person, and if disclosed in a non-work-related situation.

Disclosure of information is a very serious matter. It must be done within the context of laws and regulations and with regard to protecting ARKA's competitive advantages in the marketplace.

All inquiries or calls from the press should be reported by logging into [arka.ethicspoint.com](https://arka.ethicspoint.com) from a computer or [arkamobile.ethicspoint.com](https://arkamobile.ethicspoint.com) from your mobile phone, or calling 833-590-0845 (US) or 0800-066-8970 (UK).



### We Use Our Assets Wisely

ARKA Assets are the tools, funds and information we use in our work each day. We use these Assets for legitimate business purposes and safeguard them from loss, theft, fraud and misuse.

### We Protect Our Physical and Financial Assets

Team Members are expected to protect ARKA's physical assets and ensure their efficient use. Theft, carelessness and waste have a direct impact on ARKA's profitability.

ARKA's physical assets are to be used for legitimate business purposes, although incidental personal use may be permitted.

Only authorized employees may sign contracts or enter into transactions or obligations on behalf of the Company. Employees who manage ARKA's financial Assets must handle Company funds and financial reporting with the highest level of diligence and integrity. Embezzlement, defalcation and fraud are serious crimes, and any potential violations of law or Company policy must be immediately reported directly to the Chief Legal Officer or on EthicsPoint, which offers an option to report anonymously.

### We Safeguard Our Intellectual Property

Team Members may not use ARKA's corporate name, brand name or trademark owned or associated with the Company, or any letterhead stationery, for personal purpose.

### We Use Information Systems Appropriately

Team members should be mindful of the fact that ARKA retains the right to access, review, monitor and disclose any information transmitted, received or stored using the Company's equipment, with or without the Team Member's or third party's knowledge, consent or approval and in accordance with applicable law. Team Members should have no expectation of privacy in connection with this equipment. Any misuse or suspected misuse of such Assets must be reported to your manager or the Compliance Officer.





### Prohibition on Contracting with Suspended or Debarred Entities

ARKA shall not knowingly hire as a subcontractor, an employee or consultant, with or without pay, an individual or entity who is debarred, suspended or otherwise ineligible to participate in federal, state or local programs. If you are responsible for hiring, you should confirm that potential Team Members or consultants are not debarred or suspended, including checking for excluded parties in the watchlist screening system. Before entering into any supplier or subcontractor relationship in connection with a government contract, you must determine whether the prospective supplier or subcontractor is debarred, suspended or otherwise ineligible to participate in federal programs and, for state contracts, whether the supplier or subcontractor is ineligible to participate in programs with the relevant state (or other equivalent programs under applicable local law).

ARKA will not enter any such supplier or subcontractor relationship with individuals or entities that are debarred or suspended. If you become aware of a current supplier or subcontractor that has been debarred, suspended, proposed for suspension or debarment, or has had any other action taken against them that might impact their eligibility to perform work under their current contracts with the Company, you must contact the Chief Legal Officer within two business days of receiving this information.

If you are debarred, suspended, proposed for suspension or debarment, or have any other action taken against you that might impact your eligibility to perform work on government programs, you must contact

the Chief Legal Officer within two business days of receiving notice of the action. Depending on the circumstances giving rise to the adverse action, Team Members suspended or debarred from government contracting may be temporarily removed from their position, transferred to a different position, or terminated from employment.



# PERFORMING FOR MISSION SUCCESS

## GOVERNMENT CUSTOMERS

### Classified, Controlled and Proprietary Information

We have special obligations to comply with laws and regulations that protect classified information and controlled unclassified information. Team Members with valid security clearances who have access to classified information, and Team Members who have access to controlled unclassified information, must ensure that such information is handled in accordance with the pertinent government procedures.

ARKA does not solicit or receive any sensitive proprietary internal government information, including budgetary or program information, before it is available through normal processes.

### Disclosure of Violations of Law or Regulation

If you become aware of evidence that a principal, Team Member, agent or subcontractor of ARKA has violated a law or regulation in connection with the award, performance or closeout of a government contract or subcontract, you must immediately disclose that evidence.



To disclose a potential violation of any legal requirements, whether discussed in our Code or not, log into [arka.ethicspoint.com](https://arka.ethicspoint.com) from a computer or [arkamobile.ethicspoint.com](https://arkamobile.ethicspoint.com) from your mobile phone, or call 833-590-0845 (US) or 0800-066-8970 (UK).



# PERFORMING FOR MISSION SUCCESS

## COMPETITORS

### We Compete Vigorously, Ethically and Lawfully

ARKA believes in free and open competition within the marketplace. We should never criticize competitors and should always sell based on the good reputation of the Company and the positive features of the Company's products and services (quality, price and performance). Where a competitive comparison is necessary, only factual information should be presented.

You should never join in or discuss with competitors, customers, suppliers or other contract bidders, conduct, whether express or implied, that is intended to control the award of contracts by setting prices, engaging in exclusive dealing or bid-rigging or

other anti-competitive practices that limit full and open competition. Whenever there is a question regarding the requirements of the antitrust laws, you should contact the Chief Legal Officer as soon as possible.

Team Members shall not obtain or attempt to obtain bid, proposal or source selection information generally not available to all prospective contract bidders (such as attempting to learn a competitor's bid price on a government Request for Proposal) before the award of a government contract to which the information relates. In addition, you should not obtain or attempt to obtain a competitor's proprietary information to which you are not legitimately entitled. Any Team Member who comes into possession of proprietary competitor information to which they are not legitimately entitled, or is aware that other Team Members possess proprietary competitor information, shall immediately notify their manager and shall not further distribute any such information. Under no circumstance shall Team Members retain or use illegally or improperly obtained competitor proprietary information.



**To disclose a potential violation of any legal requirements, whether discussed in our Code or not, log into [arka.ethicspoint.com](https://arka.ethicspoint.com) from a computer or [arkamobile.ethicspoint.com](https://arkamobile.ethicspoint.com) from your mobile phone, or call 833-590-0845 (US) or 0800-066-8970 (UK).**

### Fair Dealings

The Company strives to outperform its competition fairly and honestly. Advantages over the Company's competitors are to be obtained through superior performance of the Company's solutions and services, rather than unethical or illegal business practices. Acquiring proprietary information from others through improper disclosure of confidential information from past or current Team Members of other companies is prohibited, even if motivated by an intention to advance ARKA's interests. If information is obtained by mistake that may constitute a trade secret or other confidential information of another business, or if a Team Member has any questions about the legality of proposed information gathering, they must consult their manager or the Compliance Officer.

Team Members are expected to deal fairly with ARKA's customers, suppliers, employees and anyone else with whom they may have contact in the course of performing their job. Be aware that the Federal Trade Commission Act states that "unfair methods of competition in commerce, and unfair or deceptive acts or practices in commerce, are declared unlawful." The UK Competition Act and EU laws have similar provisions regarding fair trade. It is unlawful to engage in deceptive, unfair or unethical practices, and to make misrepresentations in connection with sales activities.

Team Members involved in procurement have a special responsibility to adhere to principles of fair competition in the purchase of products and services by selecting suppliers based exclusively on normal commercial

considerations, such as quality, cost, availability, service and reputation, and not on the receipt of special favors.



### Purchasing Restrictions

ARKA is obligated to comply with all laws and contract provisions related to the purchase of products, services and technologies. In the U.S., this includes, for example, the Barry Amendment, the Buy America Act, Section 889 prohibitions on telecommunications or video surveillance and equipment or services, and FAR 52.204-23 related to Kaspersky Labs.



### We Work Internationally

ARKA follows all applicable laws governing International Trade.

#### International Business

Special care must be taken to identify and accommodate differences between international markets and those in the United States, UK and EU.

You may encounter laws when dealing internationally, which may vary widely from those in the United States, UK and EU. These laws occasionally conflict with one another. Local customs and practices regarding business and social dealings may also vary in each country. ARKA policy is to comply with all laws that apply in the countries where the Company does business. If there is a potential conflict between laws or if there are questions regarding applicable law, Team Members should bring such questions to the Chief Legal Officer. In addition, Team Members can bring questions regarding international trade laws and regulations to the Associate General Counsel responsible for trade compliance. The laws of the United States, UK, EU and the countries in which ARKA does business must be obeyed.

Requirements for industrial cooperation and offset obligations must be approved by the Chief Legal Officer and the Chief Financial Officer. Furthermore, the business practices in this Company policy supersede less-restrictive practices from other countries.

#### Anti-Corruption Laws

The Foreign Corrupt Practices Act, the UK Bribery Act and other national laws prohibit the payment of money or Anything of Value to a foreign official, foreign political party (or official thereof) or any candidate for foreign political office for purposes of obtaining, retaining or directing of business. As a Company and as Team Members, we must strictly abide by these laws. Any violation or any solicitation to violate must be reported to the President of ARKA and the Chief Legal Officer immediately.

The Foreign Corrupt Practices Act does not prohibit certain "facilitating payments," such as payments for expediting shipments through customs or placing of transoceanic telephone calls, securing required permits, or obtaining adequate police protection – transactions which simply facilitate the proper performance of duties. However, several countries, including the UK, prohibit facilitating payments. As a result, ARKA prohibits all such payments, except in situations where Team Members seek advice and written approval in advance from the Chief Legal Officer. No other ARKA officer is authorized to approve facilitating payments. All facilitating payments must be properly accounted for in ARKA's records.

# PERFORMING FOR MISSION SUCCESS

## INTERNATIONAL BUSINESS

### Anti-Boycott Law

ARKA will not participate in agreements with potential or actual customers or suppliers if the agreement falls under anti-boycott laws, nor will the Company otherwise engage in or support restrictive international trade practices or answer questions related to a boycott. All requests for boycott terms or boycott information must be reported to the Chief Legal Officer or the Associate General Counsel responsible for trade compliance.

ARKA is obligated to report all boycott requests to the U.S. Department of Commerce Office of Anti-boycott Compliance, which will be handled by the trade compliance team.

*Example: Boycott requests can be found in purchase orders, letters of credit, contracts, certificates of origin and bid instructions, among other transactional documents.*

*Examples include: "This order is placed subject to the suppliers being not on the boycott list published by the central Arab League" or "The bill of lading must state that the vessel delivering cargo does not call at Israeli ports."*



## TOOLS AND RESOURCES

### ARKA's Anti-Boycott Procedure



# PERFORMING FOR MISSION SUCCESS

## ACCURATE BUSINESS RECORDS

### We Maintain Accurate Records

We are honest, accurate, complete and timely in all aspects of our recordkeeping. Maintaining honest, accurate, complete and timely records demonstrates integrity to our stakeholders.

### Books, Records and Communications

Complete corporate records that accurately and fairly reflect ARKA transactions and the acquisition and disposition of its Assets in accordance with the International Financial Reporting Standards shall be maintained at all times. Do not participate in actions or the submission of any information that could cause ARKA's books, records or accounts to misrepresent a corporate transaction or the disposition of corporate Assets. Team Members should cooperate with ARKA's independent auditors and counsel to enable them to fully discharge their responsibilities. Do not alter, destroy, mutilate or conceal any document with the intent to impair the document's integrity or availability for use in an official proceeding.

You must retain ARKA records as described in the ARKA Record Retention and Destruction Policy and related retention schedules. Records that have met their retention requirements should be properly destroyed. Do not dispose of any information that is subject to a Legal Hold; those records cannot be destroyed, altered or deleted until Legal notifies you that the Legal Hold has been removed.

### Charging Costs and Time Card Reporting

It is your responsibility to understand timekeeping requirements and to ensure that the requirements are accurately applied in recording labor hours. Employees who file time cards shall do so in a complete, accurate and timely manner. Employees performing government contracts must be careful to ensure that hours worked and costs are applied to the account for which they were incurred and that the hours charged specifically relate to the activity or work performed and reflect actual time worked on a particular contract. No cost may be charged or allocated to a government contract if the cost is unallowable by regulation or contract provision or is otherwise improper. If you have unintentionally mischarged your time, you are required to correct it promptly. Any Team Member who fails to charge their time accurately may be subject to disciplinary action up to and including termination of employment and may be subject to civil and/or criminal liabilities.

### TOOLS AND RESOURCES

**ARKA Record Retention and Destruction Policy**

**ARKA Timekeeping Policy**

**ARKA Travel and Expense Reports Policy**

### Zero Tolerance for Retaliation

No Team Member will be subject to reprisal or retaliation for Good Faith reporting. If requested, identities will be kept confidential so far as possible. If you feel you have been retaliated against, you can report to Human Resources or the Compliance Officer, or submit a concern on our hotline: [arka.ethicspoint.com](https://arka.ethicspoint.com) or 833-590-0845 (US) or 0800-066-8970 (UK).

### We Will Investigate All Reports

All reported allegations of violations will be promptly investigated by ARKA and will be treated confidentially to the extent consistent with ARKA's interests and its legal obligations. The Chief Legal Officer will determine the appropriate nature of the investigation. Team members are expected to cooperate in the investigation. If the findings indicate that corrective action is required, ARKA will decide what steps it should take, including, when appropriate, legal proceedings to rectify the problem and prevent recurrence. As required, violations of law will be brought to the attention of the appropriate authorities or disclosed to the government.

#### Disciplinary action may be taken for:

- Authorization or participation in actions that violate our Code.
- Failure to report a violation of this Code.
- Refusal to cooperate in the investigation of a possible violation.
- Failure by a violator's manager(s) to detect and report a violation, if such failure reflects inadequate supervision.
- Retaliation against an individual for reporting a possible violation.

The nature of any disciplinary action will depend on the violation and the circumstances involved. When appropriate, the disciplinary action may include dismissal. Any disciplinary action will be reviewed and approved by the Team Member's manager, the Director of Human Resources and the Chief Legal Officer. For UK employees, please refer to the Disciplinary Policy, which is available in PolicyTech.

Team Members involved in business with the U.S. Federal Government may also report suspected violations or irregularities to the Department of Defense Hotline, which is mandated by most Department of Defense contracts. The toll-free number is 1-800-424-9098, or write to:

**Defense Hotline, The Pentagon  
Washington, DC 20301-1900**

For additional information about ethics issues related to doing business with the federal government, employees may also refer to the United States Department of Government Ethics website at [www.oge.gov](https://www.oge.gov).



### UK Disclosures and Grievance Procedure

ARKA employees residing in the UK may raise concerns through the grievance process, and investigations will be handled in line with the Grievance Policy, which is available in PolicyTech.

Alternatively, UK employees may directly report a concern in EthicsPoint at [arka.ethicspoint.com](https://arka.ethicspoint.com). Anonymous reporting is an option.

UK employees are protected by the Public Interest Disclosure Act and may report potential wrongdoing to certain entities like the Public Concern at Work organization ([www.pcaw.co.uk](https://www.pcaw.co.uk)) or your MP. However, we encourage you to try to resolve issues internally before reporting a concern to a third party.

### Waivers of Our Code

While some of the policies contained in this Code of Business Ethics and Conduct must be strictly adhered to and no exceptions can be allowed, in other cases exceptions may be possible. Any Team Member who believes that an exception to any of these policies is appropriate in his or her case, should first contact his or her manager or a member of the Human Resources Department. If the manager or Human Resources agrees that an exception is appropriate, the approval of the Chief Legal Officer and Chief Financial Officer must be obtained.

The Compliance Officer is responsible for maintaining a complete

record of all requests for exceptions to any of these policies and the disposition of such requests.

We need your support and full cooperation to ensure compliance with our Code. The Company will audit compliance with this Code and provide training to assist you in understanding the standards of conduct.

We welcome your questions about the Code. Please contact your Human Resources business partner, supervisor or the Compliance Officer, for guidance on any matter. No question is too small.



**If you become aware of a potential violation of this Code, please report it. Log into [arka.ethicspoint.com](https://arka.ethicspoint.com) from a computer or [arkamobile.ethicspoint.com](https://arkamobile.ethicspoint.com) from your mobile phone, or call 833-590-0845 (US) or 0800-066-8970 (UK).**

# GLOSSARY

## Anything of Value

A broad definition that may include cash, Cash Equivalents, gifts, meals, entertainment, recreation, charitable donations, loans, travel expenses, (airfare, hosting, etc.), job placements, consulting contracts, operational support, educational support or other payments, or free or discounted items.

## Assets

Anything ARKA uses to conduct business, including equipment, supplies, vehicles, furnishings, computer systems, software, phones, and other wired and wireless devices, as well as money, investments, financial instruments, raw materials, information, trade secrets, personnel, our brand, and our reputation.

## Bribe

Any offering, promising or giving Anything of Value to gain an improper advantage or favorable business decision.

## Cash Equivalents

Loans, stock, stock options, bank checks, traveler's checks, check or cash cards, gift certificates, money orders, investments, securities, or negotiable instruments.

## Compliance Officer

ARKA Chief Legal Officer.

## Conflicts of Interest (Personal)

Situations in which a Team Member's personal considerations or interests affect or could have the appearance of affecting their judgement or objectivity in their work for ARKA.

## Conflicts of Interest (Organizational)

Situations in which ARKA, because of other activities or relationships with other persons, is unable or potentially unable to render impartial assistance or advice to the U.S. Government, ARKA's objectivity in performing the contract work is or might be otherwise impaired, or ARKA has an unfair competitive advantage.

## Directors

Members of the Board of Managers or Board of Directors of ARKA companies.

## Employees

Full-time, part-time, temporary, and contract employees or workers of ARKA companies.

## Executives

Members of the senior management of ARKA companies.

## Family

Includes a person's spouse, domestic partner, children, siblings, parents, grandparents, grandchildren, aunts, uncles, nieces, nephews, cousins, step relationships, and in-laws.

## Immediate Family

A person's spouse, domestic partner, and minor children.

## Good Faith

Making a genuine effort to provide honest, complete, and accurate information.

## Government Officials

Employees or agents of any government anywhere in the world, even low-ranking employees or employees of government-owned affiliated, or controlled entities. The term also includes political parties and party officials, candidates for political office, and employees of public international organizations, such as the United Nations.

## Harassment

Unwelcome words, actions, or behaviors that denigrate, disrespect, or belittle an individual of create a hostile, offensive, or intimidating work environment because of a protected category. Sometimes, a person's conduct may be considered harassment even if it was not intended to be offensive.

## Internal Use only (ARKA)

Information that may be shared among Team Members, but not with outside parties unless an authorized nondisclosure agreement (NDA) has been signed.

## Kickback

Any money, fee, commission, credit, gift, gratuity, Anything of Value, or compensation of any kind provided for the purpose of obtaining or rewarding favorable treatment in connection with a contract.

## Legal Hold

Suspends all document destruction procedures to preserve appropriate records under special circumstances, such as anticipated or actual litigation or government investigations. Legal identifies what types of records or documents are required to be placed under a Legal Hold.

## Material Information

Information than an investor likely would consider important in deciding whether to buy, hold, or sell securities of a company.

## Need to Know

Team members who have a "Need to Know" information require access to that information (often confidential in nature) to do their jobs. If you are in doubt as to whether a particular individual within the Company has a "Need to Know", please contact Human Resources, the Compliance Officer, or Legal.

## Nonpublic Information

Information about a business organization that is not generally available to or known by the public (also called, "Inside Information").