Noblis Code of Ethics and Conduct



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Table of Contents

Message From the President and Chief Executive Officer **4**
I. An Innovative Company Producing Enduring Impacts **5**
A. What is a Code of Conduct For? 5
B. We Enrich Lives and Make Our Nation Safer 5
C. The Noblis Experience: Ethical, Respectful, Innovative and Efficient 5
II. About This Code **6**
A. What is the Code? 6
B. Ask Questions. Speak Up. 6
C. How Do I Know If What I am Doing Is Right? 6
D. Reporting Violations of the Code 7
E. Whistleblower Protection 7
F. Zero Tolerance for Retaliation 7
III. Respect in the Workplace **8**
A. Treat People with Respect and Dignity 8
B. Equal Opportunity and a Culture of Belonging 8
C. A Safe Workplace 8
D. Drugs and Alcohol 9
E. Environmental Protection 9
IV. Conducting Business with Integrity and Without Conflicts of Interest **9**
A. Conflicts of Interest 9
B. Outside Employment Activities 9
C. Gifts, Gratuities and Other Business Courtesies 9
D. Anti-Kickback and Bribery Laws 9
E. Personal Conflict of Interest (PCI) in Government Acquisitions 10
F. Organizational Conflicts of Interest (OCI) 10
G. Hiring Former Federal Government Employees 10
H. Political Contributions, Activities and Lobbying 11
I. Fair Competition 11
J. Responsible Science and Artificial Intelligence 11
V. Financial Integrity **12**
A. Accurate Billing, Pricing, and Record Keeping 12
B. Time Reporting 12
C. Expense Reimbursement 13
VI. Confidentiality and Communications with Third Parties **13**

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A. Noblis Confidential Information 13
B. Third-Party Confidential Information 13
C. Procurement and Protecting Sensitive Government Information 13
D. Inside Information 14
E. Licensed Material and Training Data 14
F. Communications and Social Media 14
G. When to Contact Noblis Marketing and Communications 14
VII. Company Image and Assets 14
A. Company Image 14
B. Company Assets 15
C. Company Intellectual Property 15
D. Use of Information Systems 15
E. No Expectation of Privacy 15
VIII. Compliance with Other Laws and Regulations 16
A. Comply with Laws and Regulations 16
B. Cooperation in Investigations 16
C. Mandatory Disclosure 16
D. Export Control Compliance 16
E. Human Trafficking 16
IX. Policies and Procedures 17
X. Conclusion 17
A. Acknowledgement and Statement of Compliance 17
B. Participation in Training 17
C. Changes to the Code 17
XI. Who to Contact 17
Message From the Chief Ethics and Compliance Officer 18

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Message From the President and Chief Executive Officer

Mile Corrigan



At Noblis, we've worked hard to earn a strong reputation across our industry as an honest company that's committed to doing what's right in every situation. The work we deliver to our colleagues, clients, the public and each other sets the benchmark for excellence based on our shared service standards of ethics, respect, innovation and efficiency—and is conducted in an environment where objectivity and integrity are the hallmarks.

Our commitment to this Code of Ethics and Conduct is critical to our overall success and in building relationships based on trust and confidence with our clients and colleagues every time. While the Code may not cover every possible circumstance, it helps us navigate our complex environment by providing a foundation of principles and standards that empower us to always do the right thing.

We rely on you to continuously live this Code and uphold its standards of conduct in every business encounter. If you're ever in doubt, we have several resources to help, including the anonymous Noblis Compliance Helpline Reporting System and the Compliance Helpline Website which are detailed in this Code. You may also find these resources on the KNOW or talk to your supervisor or a member of the Ethics and Compliance team to seek advice or raise concerns.

I want to thank you for all you do to help make Noblis one of the most ethical companies and an incredible place to work.

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I. An Innovative Company Producing Enduring Impacts

A. What is a Code of Conduct For?

Our Code of Conduct clearly states our values. It helps us act ethically and comply with the law everywhere we operate. It helps us know how to conduct our business the right way. Doing things the right way starts with knowing the right things. If you are in a situation where the right way is not clear, check the Code. If you think someone is not acting ethically or legally and you are not sure what to do, check the Code. The Code of Conduct is your resource—available whenever you need it.

B. We Enrich Lives and Make Our Nation Safer

Our Mission

- Solving complex scientific and technical problems in ways that benefit the public.
- Investing in a research and development program for the benefit of our clients.
- Delivering objective and unbiased solutions to our clients.
- Sharing knowledge and contributing to the state-of-the-art and practice.

Our Common Purpose

- We enrich lives and make our nation safer with our shared passion for excellence and innovation.
- We establish trust and confidence with every colleague, every client, every time.

C. The Noblis Experience: Ethical, Respectful, Innovative and Efficient

The Noblis Experience is our commitment to creating an exceptional client and employee experience with every interaction. At the heart of the Noblis Experience is our Common Purpose and our Four Service Standards: Ethical, Respectful, Innovative and Efficient.

Our Service Standards/Service Behaviors

- **Ethical:** Upholding our Noblis principles and values and doing what's right in every situation.
  - I act with integrity and truthfulness in every situation.
  - I adhere to the guidance in, and follow, the Noblis Code of Ethics.
  - I acknowledge that conflicts of interest and biases exist, and I strive to be fair in all my interactions with my clients and colleagues.
  - I raise concerns in good faith when I encounter ethically questionable situations or conduct.
  - I practice responsible science, protect data, and create solutions that serve the public interest.
- **Respectful:** Collaborating with courtesy and an open mind to establish trust and strengthen relationships and value all people.
  - I actively listen and treat others the way they want to be treated.
  - I create an environment where clients and colleagues are encouraged to share and value different perspectives.
  - I embrace difficult conversations in a timely manner with an open mind.
  - I provide recognition and feedback in a constructive way.

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- **Innovative:** Anticipating opportunities and priorities to deliver high-quality, effective, integrated services and solutions by using creative and forward-thinking approaches.
    - I actively approach my work with creativity, passion, and vision.
    - I provide integrated, valued services and solutions that exceed client expectations.
    - I intentionally leverage the power of collaboration and teamwork.
    - I am courageous in exploring solutions while considering levels of risk.
    - I embrace challenges as opportunities to make a positive impact.
- **Efficient:** Consistently providing practical, streamlined and timely services and solutions in every aspect of our business.
    - I perform my role reliably.
    - I share and apply best practices and lessons learned.
    - I uncomplicate the complicated.
    - I use time and resources wisely.
    - I anticipate and change with evolving client needs.

II. About This Code

A. What is the Code?

Our Code is fundamental to how we do business. Our Code reinforces the responsibilities we all share in protecting the Company, its assets and reputation. Our Code provides guidance on the business behaviors and relationships we expect each of you to maintain while working and interacting with colleagues, clients, business partners and competitors.

We are dedicated to providing our employees with the support and advice they need to act according to our Code and values. Every day, we conduct business and make decisions and choices on behalf of Noblis and our clients. Every day, we are confronted with situations that test our values, challenge us and call upon our judgment. Our reputation is built on our behavior. It is important that each of us understand our legal and ethical responsibilities so that we can make the right decisions every day, all the time.

B. Ask Questions. Speak Up.

We cannot live up to a commitment to act with integrity if we, as individuals, do not speak up when we should. That is why, in addition to knowing the legal and ethical responsibilities that apply to your job, we must speak up if:

- We are unsure about the proper course of action and need advice.
- We believe that someone acting on behalf of Noblis is doing—or may be about to do something—that violates this Code, the law or any of Noblis' policies.
- We have personally engaged in misconduct.

C. How Do I Know If What I am Doing Is Right?

Every day we make decisions and choices that impact Noblis and our clients. We may be confronted with situations that challenge us and test our values and judgement. Our reputation depends on us, collectively, upholding our shared values of honesty, integrity and respect. It is important that each of us understand our legal and ethical responsibilities so that we can make the right decisions every day, every time.

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Ask Yourself

- Is what I am doing lawful?
- Does my conduct align with our policies, service standards and behaviors?

D. Reporting Violations of the Code

When you suspect or know that a violation of the Code or a policy or procedure has occurred, contact the Office of the General Counsel or the Compliance Office immediately. You also have the option to report concerns anonymously to the Compliance Helpline System via phone, or online through the Compliance Helpline website. Once a potential violation is raised, it will be investigated, and, if it is substantiated, we will take necessary corrective actions to resolve it. Code violators are subject to disciplinary action including but not limited to possible termination. We may also report the conduct to the appropriate authorities. If credible evidence of a relevant violation exists, we will make a timely disclosure to the appropriate government officials.

If you are unsure of the best course of action in a particular situation, or if you have a specific business conduct question, you have options:

- Discuss your concerns with your manager.
- Read the relevant policies and procedures available in the QMS.
- Report potential issues or concerns anonymously by calling the Compliance Helpline Reporting System at 1-888-297-4192 or logging on to www.ethicspoint.com
- Contact the Office of the General Counsel at legal.office@noblis.org or the Noblis Ethics and Compliance Office at complianceoffice@noblis.org.

The most important thing is that you ask the question or raise the concern. Any employee who, in good faith, seeks advice, raises a concern or reports misconduct is following this Code—and doing what's right.

E. Whistleblower Protection

If you suspect wrongdoing involving a federal government contract, you may report the suspected conduct directly to a designated government official as described in our Whistleblower Policy or Whistleblower Policy – Intelligence Programs.

If you are unsure how to report your concern, we encourage you to talk with your manager, the Office of the General Counsel or the Compliance Office to determine the best course of action. If you think someone is retaliating against you for reporting a wrongdoing involving a federal government contract, you may file a complaint with the appropriate agency Inspector General.

F. Zero Tolerance for Retaliation

We do not tolerate or permit retaliation of any kind against good faith reports or complaints of violations of this Code or other illegal or unethical conduct. If you are concerned about retaliation or believe that you have been subject to retaliation for reporting a violation of the Code, a corporate policy, law or regulation, you should immediately contact your manager, the Chief People Officer, the Office of the General Counsel, or the Compliance Office.

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III. Respect in the Workplace

We are committed to maintaining a respectful workplace where all individuals are treated with dignity, collaboration is encouraged, and innovation thrives through open and constructive engagement.

A. Treat People with Respect and Dignity

We treat others with respect and dignity. We value all individuals because it's the right thing to do and promotes a culture of belonging while encouraging collaboration and new ways of thinking that help us develop solutions that meet or exceed our clients' needs. We conduct ourselves in a manner appropriate to the workplace, to keep all work environments free of harassment,

Wherever you work, you represent Noblis and your conduct reflects on the company. Whether at a client site, another company's offices, a government installation, a professional training site, a conference, a vendor fair, or Noblis itself, you should always act in a professional manner, including maintaining the following behavior:

- Meet standards of common civility and treat others with respect.
- Refrain from behavior that could compromise the integrity of the Company.
- Strictly comply with the Employment Policy.
- Do not make disrespectful remarks about current or former clients, vendors, subcontractors, other teammates, other employees or about the Company in general.

B. Equal Opportunity and a Culture of Belonging

We are committed to a culture of belonging.

We are committed to a culture of connection, belonging, engagement, empowerment and authenticity where all people can reach their full potential. **We encourage each person to bring the full depth of who they are to work every day, everywhere, with everyone.**

We are an equal opportunity employer.

Employment decisions are made without regard to race (as well as because of or on the basis of traits historically associated with race, including hair texture, hair type, and protective hairstyles such as braids, locks and twists), color, religion, national origin, sex, age, physical or mental disability, military/veteran status or other characteristics protected by law. AI systems may not be used as the sole basis for decisions that could materially affect individuals including but not limited to hiring and promotion decisions.

C. A Safe Workplace

Our most important goal is to protect the health and safety of our employees and to provide a safe, secure and healthy workplace for our employees.

We prohibit firearms, weapons and other items that may be used to inflict bodily harm or intimidate others in our facilities or those of our clients and business partners. We immediately communicate actual or potential Noblis-related safety, health or environmental concerns to respective managers, Human Resources or the Facility Security Officer (FSO). We report potential work-related injury and/or illness as soon as practicable by submitting a First Report of Injury and Accident form in the Employee Service Portal. For more information see the Corporate Security Policy.

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If you are experiencing a real and immediate threat, call 911. If you are unsure, you can call Noblis Security anytime, day or night, at 703-610-2438.

D. Drugs and Alcohol

Noblis maintains a "drug-free" workplace. Being under the influence of illicit drugs or alcohol while working is prohibited. For more information see the Drug-Free Workplace Policy.

E. Environmental Protection

We strive to preserve and protect the environment, both in our workplace and in the community. This translates into complying with the requirements of all applicable environmental laws and regulations in our activities, and routinely reviewing operations so we continually improve our environmental performance. You are responsible for observing sensible environmental practices and taking reasonable steps to protect the environment in performing your work.

IV. Conducting Business with Integrity and Without Conflicts of Interest

Our clients value our objectivity. Every action we recommend, every acquisition in which we participate and every expense we incur is made solely because it is the right thing to do. To accomplish this, we conduct our business with integrity and strive to maintain a work environment free of conflicts of interest.

A. Conflicts of Interest

We must avoid conflicts of interest between our personal affairs and our obligations to Noblis and its clients. At times, you may find yourself in a situation where you, your spouse, children, parents, in-laws or someone else with whom you have a close personal relationship is a supplier, client, competitor or employee of Noblis, or has a financial interest in such an organization. In these cases, you must recuse yourself—even from business dealings where there's just a perception of a conflict of interest—and notify the Compliance Office who will properly evaluate the situation.

For more information see the Gratuities and Personal Conflicts of Interest Policy.

B. Outside Employment Activities

We must avoid outside businesses and other activities that create or have the potential of creating a conflict of interest with our work. All outside employment and activities must be approved in advance.

For more information see the Employment Policy and the Outside Employment Form.

C. Gifts, Gratuities and Other Business Courtesies

We win business and select business partners because of the merits of our people, products and services. To avoid even the perception of impropriety, we significantly restrict accepting or providing business courtesies from or to companies, agencies or persons with whom we conduct business. "Business courtesies" include gifts, loans, services, meals, entertainment, unusual hospitality or other items of value.

D. Anti-Kickback and Bribery Laws

In the United States, and in many other countries, it is illegal to provide, offer or accept a kickback or bribe in return for favorable treatment in connection with a government contract or business transaction. A kickback or bribe may take the form of any money, fee, commission, credit, gift, gratuity, item of value or compensation of any kind. Our policy on kickbacks and bribes is clear: they are illegal and are not allowed.

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As a general rule, when in doubt, say no if a person, group or corporation offers you anything of monetary value, such as a rebate, present, gratuity or favor, that could influence a matter in which Noblis has an interest or could affect your actions or those of our company or clients. Even if you do not think it would influence your professional conduct, accepting gifts may reflect poorly on the integrity of your work and/or our mission and reputation to remain objective at all times.

For more information see the Gratuities and Personal Conflicts of Interest Policy.

E. Personal Conflict of Interest (PCI) in Government Acquisitions

We must comply, in all respects, with all federal requirements regarding procurement integrity and ethics. Employees participating in federal procurement activities must remain impartial and unbiased when advising our government clients. A PCI might exist if you or a close family member have a financial interest in an organization that Noblis is overseeing or evaluating for a public procurement. If you are involved with providing acquisition support to a Noblis government client, you must comply with all applicable laws, regulations and company and client procedures concerning conflicts of interest and financial disclosures. You must also disclose any financial conflicts of interest in accordance with our PCI policies and procedures. Please remember that even the appearance of a conflict of interest could seriously compromise Noblis' client relationships.

For more information see the Personal Conflicts of Interest and Support to Client Acquisitions Procedure.

F. Organizational Conflicts of Interest (OCI)

We are committed to maintaining the integrity of the federal procurement process by complying with all organizational conflicts of interest (OCI) rules. These rules may prohibit us from engaging in work where we have an unfair competitive advantage due to other work we perform for the government or where we are unable to give impartial advice to the government because of conflicting roles. We should all exercise common sense, good judgment and sound reasoning when making decisions about whether an actual, potential or perceived OCI exists. We should be particularly cautious when (i) writing requirements or statements of work for future procurements; (ii) performing work that provides access to non-public information that could provide Noblis a competitive advantage in a future procurement or (iii) evaluating Noblis' own products or services or those of a company with whom we have a material financial interest. OCIs are a complex subject. We take them seriously and proceed with caution if even the appearance of a conflict could exist.

For more information see the OCI Policy and the OCI Procedure.

G. Hiring Former Federal Government Employees

Any discussions or contacts with current or former U.S. government employees (military or civilian) for the purpose of exploring potential employment opportunities are subject to federal conflict of interest laws and regulations. We may not engage in employment discussions with any current federal government employee who is involved in a matter affecting Noblis unless the federal employee has recused themselves or received a waiver. Similarly, once hired or retained, former government employees must strictly comply with any prohibitions stemming from their government employment that affect the work they perform for Noblis. If a current federal government employee initiates any employment discussions with you, please contact Human Resources and the Compliance Office for guidance.

For more information see the Employment of Federal Government Employees Procedure.

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H. Political Contributions, Activities and Lobbying

We encourage voluntary involvement in the political process, but you must participate on your own time, at your own expense and using your own resources. You may not make political contributions or expenditures on Noblis' behalf or involve Noblis in political activities. In addition, you must refrain from implying Noblis sponsorship in any way—this includes using Noblis' name and/or your employee title. All correspondence with elected officials must indicate that you are expressing your own personal opinions. Additionally, you should avoid even the appearance of lobbying on behalf of Noblis.

I. Fair Competition

We value open and fair competition. We do not engage in activities that would unlawfully restrain trade or violate anti-trust laws such as price fixing or coordinating bids, boycotting customers or suppliers, entering into agreements that divide a market or teaming with companies in ways that create less competitive outcomes for customers.

For more information see the Antitrust Policy.

J. Responsible Science and Artificial Intelligence

We must conduct scientific research and technical work with the highest standards of ethics, integrity, and scientific rigor. Employees must comply with accepted standards of scholarly and professional conduct and must not engage in misconduct such as fabrication, falsification, plagiarism, intentional bias, or other practices that undermine the integrity of scientific or technical research.

We recognize that artificial intelligence (AI) technologies have the potential to significantly enhance productivity, innovation, problem-solving, and decision-making for both our employees and our federal government clients. At the same time, these technologies present important risks—including risks related to privacy, data protection, cybersecurity, bias, accuracy, intellectual property, and the misuse of sensitive information—that must be carefully managed.

Employees must not use AI tools, including generative AI tools (GenAI) in ways that could compromise Noblis, employee, or client data, confidential or proprietary information, intellectual property, or other protected information, including Controlled Unclassified Information (CUI) and personally indentifiable information (PII). The use of AI technologies must comply with applicable laws, regulations, contractual obligations, internal policies, and approved governance processes. Noblis employees are responsible for knowing the sensitvity the data used and protecting these data appropriately.

We support the responsible development and delivery of AI-enabled capabilities for our clients that are trustworthy, transparent, safe, and aligned with the public good, in accordance with applicable federal guidance. When developing, deploying, or using AI-enabled tools or capabilities, employees must comply with all applicable policies and corporate frameworks to ensure these technologies are:

- Lawful and ethical, consistent with applicable laws and government requirements
- Protective of privacy, confidentiality, and intellectual property rights
- Secure and resilient, safeguarding sensitive and government information
- Accurate, reliable, and appropriately validated for their intended use
- Designed and evaluated to reduce harmful bias and unintended impact

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- Subject to appropriate human judgment and oversight

Noblis employees are responsible for the accuracy and integrity of all final work products, regardless of whether AI tools, such as GenAI, were used during development. GenAI outputs should be regarded as preliminary or assistive content—not as definitive or authoritative sources. It is essential that employees independently verify all data, citations, sources, and calculations prior to incorporating them into decisions, formal reports, or client deliverables.

Noblis encourages transparency and documentation in the development and use of AI systems so that decisions supported by AI can be explained, reviewed, and improved over time. Employees should exercise sound judgment and seek guidance when questions arise regarding the responsible use or development of artificial intelligence technologies.

For more information see the Generative AI Use Policy and Guidelines for Using Generative AI**.**

V. Financial Integrity

A. Accurate Billing, Pricing, and Record Keeping

We understand the importance of responsible and accurate financial disclosures and record keeping. To assist in the production of full, fair, accurate, timely and understandable financial information and disclosures we commit to:

- Being clear and accurate in every aspect of our billing and pricing.
- Being cost-conscious when acquiring materials and services for the company.
- Accurately pricing products and services, including aligning staff to contractual labor categories for which they are qualified.
- Not splitting invoices to hide costs or avoid payment procedures.
- Preparing bills that are accurate and complete.
- Including supporting documentation for every company payment that describes its purpose.
- Never making or approving a payment on the company's behalf with the intention, understanding or awareness that any part of the payment will be used for a purpose other than the one described by supporting documents.
- Taking responsibility for the complete accuracy of all cost charges and records. (Please note: falsifying records is a serious offense that can result in criminal and financial penalties for the company and the people involved).
- Never making statements, communications or representations to prospective clients that are not truthful and accurate in all respects.
- Never using company funds or assets for any unlawful or improper purpose, including personal use.

B. Time Reporting

Reporting labor hours and absences accurately and in a timely manner is our legal and ethical responsibility. Improper time charging may lead to disciplinary action up to and including termination of employment. You

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must know the charge code for the projects you support and must accurately and honestly report all hours worked after the work has been performed or at the end of the workday, whichever comes later.

For more information see the Time Reporting and Leave Procedure and the Time Reporting Policy.

C. Expense Reimbursement

We only incur expenses that are reasonable, necessary and authorized for business purposes. We must record and submit business-related expenses in a timely and accurate manner with proper documentation.

For more information see the Travel Handbook Procedure.

VI. Confidentiality and Communications with Third Parties

A. Noblis Confidential Information

You may receive regular exposure to a wide range of information about Noblis, its business and its employees, including proprietary and confidential information. All employees must use reasonable care to protect proprietary and confidential information, including our strategies for the future, financial information, trade secrets, intellectual property and internal business practices from unauthorized use and disclosure, including the input of such data in an unapproved AI tool. Whenever you receive an inquiry requiring you to disclose proprietary or confidential information about Noblis, refer to your manager, Mission Area or Shared Services VP/ Director or General Counsel. If you leave Noblis, you may not keep any Noblis proprietary or confidential information and you must continue to maintain the confidentiality of the information following your departure.

B. Third-Party Confidential Information

In the regular course of doing business, we often receive proprietary and confidential information from third parties, such as teaming partners, subcontractors and suppliers. We are bound by the confidentiality provisions in our contracts with those third parties. Please understand those terms before you disclose third-party information either internally or externally or input any third-party data into an AI tool. In addition, if you receive information from another company marked “company-confidential” or some other kind of similar, restrictive markings, you must comply with those markings. Revealing information provided in confidence and for a specific purpose jeopardizes our ability to work closely with other companies, and that jeopardizes our success. If you leave employment at Noblis, you may not keep any third-party confidential information and you must continue to maintain the confidentiality of such information. Similarly, you may not violate the intellectual property rights of third parties, including your former employer, and you must abide by all post-employment restrictions regarding the protection of third-party proprietary and confidential information.

C. Procurement and Protecting Sensitive Government Information

Our clients often provide us with sensitive information including classified and controlled unclassified information. The rules and regulations that govern how we handle this information, its acquisition, use, storage, distribution and ultimate disposition—are strict. As a Noblis employee, you must know and follow government handling requirements, including under the Procurement Integrity Act which prohibits unlawfully obtaining or disclosing bid, proposal or source-selection information related to an ongoing federal procurement. Employees must not input non-public, sensitive government information into public or unapproved AI tools unless such use has been authorized through Noblis governance processes.

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These requirements are described in more detail in the Corporate Security Policy and the Noblis Corporate Security Operations Plan Procedure. You should know that violations could lead to disciplinary action or even dismissal. So, handle with extreme care!

D. Inside Information

You may not use any Noblis or third party proprietary or confidential information gained through your employment with Noblis to further your private interests or for your personal gain or benefit or those of any other person or entity.

E. Licensed Material and Training Data

Using, copying or disclosing software and other materials owned by third parties or licensed to the company is restricted. Unless it is specified in the license agreement, assume licensed software cannot be copied and that its use is limited to corporate purposes.

Any data used to train, test, or evaluate AI systems must be obtained and used in a lawful and authorized manner and respecting all applicable intellectual property, licensing, and data rights requirements.

F. Communications and Social Media

We must apply common sense and use social media responsibly and safely, in the best interest of Noblis as stated in the Noblis Social Media Policy. You are personally responsible for what you communicate in social media. Use good judgment about what you post and remember that anything you say on these platforms can impact the company's reputation. We encourage professionalism and honesty in social media and other communications.

Never post or forward statements, audio, video, pictures or other materials that could be considered offensive, malicious, obscene, harassing or threatening to any readers or viewers.

We recognize the value that social media can bring to a business. Certain employees are authorized and encouraged to use social media as part of their job duties for Noblis' marketing, public relations, recruiting, corporate communications or other business purposes. No employee may open or create a social media account on behalf of or for the benefit of Noblis or use Noblis registered trademarks in connection with a social media account without prior authorization from the General Counsel.

G. When to Contact Noblis Marketing and Communications

The Noblis Marketing and Communications (MarCom) department manages all public news releases and social media for the company. Only designated Noblis spokespeople are authorized to release information to the public. Unless you have been designated as a spokesperson, you should not respond to inquiries from the press. You should forward all inquiries from the media to the MarCom team immediately.

VII. Company Image and Assets

A. Company Image

Our reputation is among our most valuable assets. When representing Noblis, you must conduct yourself in a manner that reflects positively on the company's image and identity and never disparage or misrepresent the company's image or brand.

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B. Company Assets

Our employees may not use corporate property, facilities, computers, trade secrets and other intellectual property, office supplies, equipment, products, confidential information, and funds for personal use in violation of our policies. You are responsible for using good judgment to ensure that corporate assets are used efficiently, responsibly and for their intended business purpose.

C. Company Intellectual Property

During your employment, you may create intellectual property for Noblis or its clients. All intellectual property you create during your employment or using Noblis assets or resources belongs solely to Noblis. Conversely, you may not bring any personal or pre-existing intellectual property in your possession to Noblis or use it in connection with our work. Our policy is to identify, maintain and protect intellectual property. Employees who create or develop intellectual property must notify Noblis pursuant to applicable policy. For more information see the Intellectual Property Policy.

D. Use of Information Systems

Information systems—the hardware, software and data that are stored, processed, transmitted, and reported—are critical to business success. You must use these systems responsibly, in accordance with all information system security policies, including the Rules of Behavior and Acceptable Use Standards for Noblis Information and Systems Resources Form. You must use Noblis information systems for legitimate business purposes only and may not use our information systems to:

- engage in communications that might be considered illegal, offensive, defamatory, harassing, obscene, vulgar or otherwise disruptive to normal business activity.
- disseminate information and data to unapproved systems.
- visit inappropriate Internet sites.
- improperly disseminate copyrighted or licensed materials or confidential and proprietary information of Noblis, our clients, or third parties including through the use of GenAI.

You must also protect the security (i.e., confidentiality, integrity, availability) of our information systems and:

- information used to access company information systems, including user IDs, passwords, tokens and authenticators and building-access key cards.
- corporate data, and the data entrusted to us by our clients.
- information systems from physical and logical damage. You must never disable or bypass Corporate-provided security mechanisms.

E. No Expectation of Privacy

Any communications you have at work or using Noblis resources (e-mail, voicemail, websites, etc.) are not private. Records of your communications may be made and used for a variety of reasons and may be monitored to verify that Company policies are being followed.

Please remember:

- Noblis information systems are to be used for legitimate business purposes only.

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- You should have no expectation of privacy while using any Noblis information resource regardless of time or location of use.
- Your use of any Noblis information resource is monitored.

Remember that Noblis has rights of access to all company property, including computers, and all communications, e-mail and voicemail messages, records and information created in the business setting, regardless of whether you consider the information or communication to be private.

VIII. Compliance with Other Laws and Regulations

A. Comply with Laws and Regulations

It is important that you comply with all laws, regulations and required standards that apply to personal and company activities. This Code highlights several of the areas of law that you must understand. But it is by no means exhaustive. That's why it is important that you read, understand and comply with all our policies and procedures.

Please contact the Office of the General Counsel at legal.office@noblis.org or the Compliance Office at ComplianceOffice@noblis.org if you have any questions regarding the application or interpretation of any law, regulation or this Code.

B. Cooperation in Investigations

You are required to fully cooperate with all internal investigations including contractual reviews, audits and requests for financial data or other information. You may never lie or mislead an investigator or destroy or alter any documents or electronic records. The company will comply, to the greatest extent possible, with all government investigations. And, if requested, you are also required to fully cooperate with government investigations. If you are contacted directly by the government regarding an investigation, you must immediately notify the Office of the General Counsel at Legal.Office@noblis.org.

For more information see the Investigations Procedure.

C. Mandatory Disclosure

You are responsible for immediately reporting to your manager, Mission Area or Shared Service VP or Director, General Counsel or Compliance Officer any information regarding a potential violation of any law or any other government contracting regulations involving fraud, conflicts of interest, bribery or gratuities, false claims or overpayments on a government contract.

For more information see the Mandatory Disclosure Policy.

D. Export Control Compliance

We comply with all laws and regulations that prohibit trade with certain countries, organizations and individuals or require government authorization for exporting, re-exporting or transferring sensitive hardware, technology or other information.

For more information see the U.S. Foreign Trade Control Compliance Policy.

E. Human Trafficking

We condemn all human rights abuses including human trafficking, slavery and forced labor. We seek to provide working conditions for all employees that are safe and healthy and free of harassment and discrimination. All

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employees may terminate their employment voluntarily. We expect our supply chain to uphold similar standards regarding human rights and we have zero tolerance for corruption.

For more information see the Combatting Trafficking in Persons Policy.

IX. Policies and Procedures

Policies and procedures related to the various sections in the Code are located in the QMS on the KNOW.

Trainings related to various aspects of the business are located in the Noblis Learning and Development Center (LDC) on the KNOW. You must complete training related to your job as required, and review training materials periodically to keep requirements fresh in your mind.

X. Conclusion

A. Acknowledgement and Statement of Compliance

On an annual basis, you must acknowledge that you have read and will comply with the Code and the policies and procedures it represents. Each year, we provide an acknowledgement statement to all current employees for the required Annual Statement of Compliance—and all new employees are required to sign a similar acknowledgement upon hire.

B. Participation in Training

Noblis has designed a training program to help employees understand our Code, the legal and regulatory requirements regarding the conduct of our business and to learn how to recognize and react to situations requiring ethical decision making. You will be required to take annual Code training and may be required to take other mandatory trainings by specific due dates as applicable. Refer to the Training and Professional Development Procedure.

C. Changes to the Code

This Code is not a contract. We may update, modify and interpret the Code and our policies at our sole discretion.

XI. Who to Contact

Call or report via the Compliance Helpline Reporting System, which is available to you 24 hours a day.

- Report potential issues or concerns anonymously by calling the Compliance Helpline Reporting System at 1-888-297-4192 or logging on to www.ethicspoint.com
- Contact the Office of the General Counsel at Legal.Office@noblis.org or the Noblis Ethics and Compliance Office at ComplianceOffice@noblis.org

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Message From the Chief Ethics and Compliance Officer

Lauren McGinley





Noblis has been named on Ethisphere's annual "World's Most Ethical Companies" list 14 times.

This Code is all about doing what's right. Business ethics are critical for our success and for building trust and transparency among our employees, our partners and our clients.

Our work with government clients has a significant and meaningful impact on our society. Because we work in a highly regulated industry, it can be difficult to always instinctively know the best way to handle a particular situation.

This Code is designed to help each of us navigate through this complex environment and aim higher than following normal business practices or merely complying with the law. Our Code is designed to help us conduct our business in a manner that we can all be proud of and that reflects our high ethical standards.

No business ethics policy can cover every circumstance that might arise in a diverse and complex business such as ours. Because of this, we must rely on you to observe the spirit of our Code and to uphold the highest standards of conduct in all our business dealings and with each other.

This Code provides several reporting methods, including the anonymous Noblis Compliance Helpline Reporting System, which is available to you 24 hours a day, at 1-888-297-4192 or the Compliance Helpline Website through ethicspoint.com.

Any employee, who, in good faith, seeks advice, raises a concern, or reports misconduct is following this Code and is Doing What's Right.

We do not permit any form of retaliation against good faith reports or allegations of violations of this Code or other illegal or unethical conduct. Please reach out if you have any questions. We're here to guide you along the way.

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