CODE OF ETHICS AND CONDUCT

Doing what’s Right—Doing What Works
MESSAGE FROM THE PRESIDENT AND CHIEF EXECUTIVE OFFICER

Since its formation, Noblis has earned and maintained a reputation across our industry as a company that conducts its business in accordance with the highest standards of ethical behavior, honesty, and integrity. Our reputation is important because it influences the way our clients feel about the services and solutions our teams deliver and it affects whether our employees find Noblis to be a truly great place to work. For these reasons, we must all work together to protect and preserve our reputation by maintaining and elevating our strong ethical culture. We at Noblis believe that our clients and the public deserve nothing less than work that meets the highest standards of excellence, conducted in an environment where objectivity and integrity are the hallmarks.

Our shared values of respect, integrity, and honesty sit at the heart of the Noblis Code of Ethics and Conduct (“Code”). The content of the Code is critically important to the success of our organization and reflects the tone and standards for our company.

This Code has been designed to guide our work, shape our workplace, and define Noblis as a company deeply committed to ethical business conduct. It is not intended to be a comprehensive guide to all of our policies and procedures or all of our responsibilities under the laws that apply to Noblis. However, it does provide the basic principles and core values to help you (our employees) resolve the ethical and legal issues you may face on a day-to-day basis.

Our expectation is that all of us, including myself, adhere to the highest ethical and legal standards, and we hold each other accountable to those standards as well. I hope you find this Code to be a useful guide that enables you to always do the right thing. Please read it and if you have any question do not hesitate to ask them. Thank you for all you do to make Noblis a truly special and great place to work.
MESSAGE FROM THE PRESIDENT AND CHIEF EXECUTIVE OFFICER

MESSAGE FROM THE CHIEF ETHICS AND COMPLIANCE OFFICER

This Code is all about doing what’s right. Business ethics are critical for Noblis’ 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 hallmark 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 (our employees) to observe the spirit of our Code and to uphold the highest standards of conduct in all of 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. Noblis does not permit any form of retaliation against good faith reports or allegations of violations of this Code or other illegal or unethical conduct.

Please let me know if you have any questions. We’re here to guide you along the way.
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NOBLIS—
AN INNOVATIVE COMPANY PRODUCING ENDURING IMPACTS
We are committed to doing what’s right and doing what matters for our clients and our nation.

MISSION
To provide scientific research, engineering, and development in the public interest by:
• **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; and
• **Sharing** knowledge and contributing to the state-of-the-art and practice.

VISION
An awesome company that advances, serves, and defends our nation through the application of science, technology, and strategy. We collaborate, innovate, and deliver.

VALUES
Noblis’ clients and the public deserve nothing less than work that meets the highest standards of excellence, conducted in an environment where objectivity and integrity are the hallmarks.

Science and technology are fundamental and critical to solving many of our nation’s most critical and global problems. Noblis is committed to a continuing pursuit of advancing technology and committing to innovation and discovery. We understand that the best way to apply and build on knowledge is to share it with each other, our clients, and the public in the spirit of collaboration that comes from teamwork.

Noblis is its people, people with unique lives and goals. With this in mind, respect for the individual guides our conduct. Putting the public first keeps us true to our mission.

Our values reflect our belief that Noblis’ clients and the public deserve nothing less than work that meets the highest standards of excellence.

BRAND-BASED BEHAVIORS
Noblis is no ordinary company. Noblis is a nonprofit science, technology and strategy organization dedicated to creating forward-thinking technical and advisory solutions in the public interest.

The following brand-base behaviors guide how we treat our clients, our partners, our communities, and our coworkers:
• **Principled.** We strive to do the right thing in every situation—no matter what. Doing what’s right.
• **Passionate.** We care deeply and let others know what really matters from our perspective.
• **Practical.** We develop solutions that work in the real world and endure.
• **Collaborative.** We seek out, listen to and work with others to add value for our work.
• **Forward-Thinking.** We anticipate our organization and client’s needs and ask ourselves what we can do today to help them succeed tomorrow.
ABOUT THIS CODE

WHAT IS THE CODE?

Noblis’ mission, vision, values, and brand-based behaviors set the foundation for our Code. The Code provides guidance about business behavior expected of Noblis employees as we work and interact with fellow employees, clients, business partners, and competitors. The Code is a statement of the fundamental principles that govern the conduct of our business and relationships with our clients, employees, business partners, and competitors. Behavior matters.

The Code applies to the Board of Trustees, officers, and all Noblis employees, subsidiaries or affiliates at all Noblis locations. The Code is fundamental to how we do business and reinforces the responsibilities we all share in protecting the Company’s reputation.

The Office of the General Counsel and the Compliance Office are dedicated to giving employees the support and advice they need to act according to the Code and our values.

The basic areas covered by this Code are:

- **Respect in the Workplace.** Employees, subcontractors, agents, officers and trustees are an essential part of Noblis’ success. Everyone is a member of the corporate team, and each one of us deserves to be treated with dignity and respect. Our respect also extends to our clients.

- **Conflicts of Interest.** Long-term, trusting business relationships are built when participants are honest, open and objective. You are expected to uphold the highest standards of professional integrity and to avoid conflicts of interest.

- **Financial Integrity.** It is critical that our financial records are properly and accurately maintained in accordance with applicable laws and regulations.

- **Confidentiality and Communications with Third Parties.** We will be truthful and accurate when engaged in communications with third parties, but some information is meant to be kept secret. For example, Noblis general business, strategic, and financial information are considered confidential. Results of analysis for our clients may not be shared. You must maintain the privacy of confidential information entrusted to you by Noblis and its clients, subcontractors, and suppliers, except when disclosure is required by laws, regulations or legal proceedings.

- **Gifts, Gratuities, and Other Business Courtesies.** To avoid even the appearance of impropriety, we adhere to significant restrictions on the types of business courtesies we receive from or offer to companies, agencies and persons with whom we do business.
Company Image and Assets.
You are expected to conduct yourself in a manner that reflects positively on the Company’s image and identity. Noblis expects its employees to dress professionally. Our dress code is business casual. You are also responsible for using good judgment to ensure that the assets of Noblis and its clients are used efficiently, responsibly and for their intended business purpose and not misused or wasted.

Compliance with Laws and Investigations.
We will comply with all applicable laws and regulations in all of our activities. This means we must follow not just the letter of the law, but also the spirit of the law, doing the right thing and acting with the utmost integrity.

Expectations and Responsibilities.
Every day, we conduct business and we 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 test our judgment. Noblis’ 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.

ASK QUESTIONS—SPEAK UP
This Code is designed to serve as a broad outline of the legal and ethical principles adopted by Noblis. You can learn more about those principles by referring to the Noblis Quality Management System (QMS) webpage, which addresses Noblis’ policies and procedures. This Code and Noblis’ Policies and Procedures must be used along with your common sense and good judgment. Specific policies and procedures referenced in this Code are located in the QMS.

You are responsible for your own conduct. No one has the authority to make another person violate the Code, and any attempt to direct or otherwise influence someone else to commit a violation is itself a violation of this Code.

If you are a manager, you are also charged with making sure that employees who report to you understand and follow the Code, as well as complete any required compliance or ethics training.

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, you must speak up if:
• You are unsure about the proper course of action and need advice;
• You believe that someone acting on behalf of Noblis is doing—or may be about to do something that violates the law or Noblis’ policies; or
• You have personally engaged in misconduct.

WHERE TO GO FOR HELP
If you are unsure as to 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.
• Call the Compliance Helpline Reporting System, which is available to you 24 hour a day. Compliance Helpline reports may be made anonymously by telephone at 1-888-297-4192 or online at the Compliance Helpline Website through ethicspoint.com.
• Contact the Office of the General Counsel at 703-610-2134, legal.office@noblis.org; or the Compliance Office at 703-610-2505 or at NoblisCompliance@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.

**REPORTING VIOLATIONS OF 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 or online through the Compliance Helpline website. After a possible violation is brought to the Company’s attention, it will be investigated, and, if substantiated, resolved through appropriate corrective action. Those found to have violated the Code will be 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.

**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 – Intelligence Programs or Whistleblower Policy – Other Than Intelligence Programs. When you are in doubt about how to report a concern, you are encouraged 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 you have been retaliated against concerning a report of wrongdoing involving a Federal government contract you may file a complaint with the appropriate agency Inspector General.

**ZERO TOLERANCE FOR RETALIATION**

Noblis does 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 Vice President of Human Resources, the Office of the General Counsel, or the Compliance Office.
RESPECT IN THE WORKPLACE

We are committed to maintaining and creating a diverse and inclusive work environment where individuals with different viewpoints, backgrounds, and talents are sought after, chose to grow their careers and thrive.

TREAT PEOPLE WITH RESPECT AND DIGNITY

We are all expected to treat others with respect and dignity. We value an inclusive workforce because it promotes diversity of thinking and reaching solutions that help us achieve and meet the needs of our customers. You are expected to conduct yourself in a manner appropriate to the workplace, to keep all work environments free of harassment, and to conduct all relationships with the appropriate level of respect and with integrity.

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 Work Environment Policy; and
- Do not make disrespectful remarks about current or former customers, vendors, subcontractors, other teammates, other employees or about the Company in general.

DIVERSITY

We welcome diversity and inclusion in the workplace and among our customers and suppliers. We are committed to equal employment without regard to race, color, religion, sex, national origin, age, medical condition or disability, sexual orientation, veteran status, or any other characteristic protected by law.

DRUGS AND ALCOHOL

Noblis maintains a drug-free workplace. If you observe any drug or alcohol abuse in the workplace, or in relation to Noblis’ work, you should report it to your manager, Human Resources, the General Counsel or the Compliance Office.

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. We strive to do no environmental harm. You are responsible for observing a sensible environmental practices and taking reasonable steps to protect the environment in performing your work.

A SAFE WORKPLACE

It is our goal to protect the health and safety of our employees and to provide a safe, secure and, healthy workplace for our employees.
Noblis prohibits firearms, weapons, or other items that may be used to inflict bodily harm or intimidate others from our facilities. You must immediately communicate any safety, health, or environmental concerns related to your Noblis activities to your manager, Human Resources or to the Facility Security Officer (FSO). Any potential work-related injury and/or illness must be reported as soon as practicable after its occurrence to the Human Resources Benefits Department.

**EMPLOYEE PRIVACY**

We respect every employee’s concern over confidentiality of personally identifiable information (PII), including health information (PHI). Employees who are responsible for maintaining PII and PHI, and those who are provided access to that information, must comply with all privacy laws and regulations.
CONDUCTING BUSINESS WITH INTEGRITY AND WITHOUT CONFLICTS OF INTEREST

Objectivity is at the heart of our value to our clients. Every action we recommend, every acquisition in which we participate, and every expenditure we incur, must be made on one basis alone—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.

CONFLICTS OF INTEREST

Every Noblis employee is required to avoid conflicts of interest between your obligations to Noblis and your personal affairs. 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 and refrain from business dealings where you have even the appearance of a conflict of interest and bring such relationships to the attention of the Compliance Office so that they can be properly evaluated.

PERSONAL CONFLICT OF INTEREST (PCI) IN GOVERNMENT ACQUISITIONS

Noblis employees 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 support or are involved with providing acquisition support to a Noblis government client, you are required to comply with all applicable laws, regulations and procedures of Noblis and its clients concerning conflicts of interest and financial disclosures. You are required to 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.

ORGANIZATIONAL CONFLICTS OF INTEREST (OCI)

Noblis employees also must comply with the rules regarding organizational conflicts of interest (OCI) rules. These rules may prohibit Noblis from engaging in work where it has an unfair competitive advantage due to other work it performs for the Government or where it is unable to give impartial advice to the Government because of conflicting roles. All employees should exercise common sense, good judgment, and sound reasoning when making decisions about whether an actual, potential, or perceived OCI exists. Employees 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. OCIs are a complex subject. We take them seriously and proceed with caution if even the appearance of a conflict could exist. If you suspect that an OCI might arise please discuss it with General Counsel or the Compliance Office.
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 with Noblis are subject to federal conflict of interest laws and regulations. Employees 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 himself or herself 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.

OUTSIDE EMPLOYMENT ACTIVITIES

Noblis employees are expected to avoid outside businesses and other activities that create or have the potential of creating a conflict of interest with their work at Noblis. All outside employment and activities that could create a conflict of interest must be approved in advance by your Mission Area Director and General Counsel.

POLITICAL CONTRIBUTIONS, ACTIVITIES AND LOBBYING

Voluntary involvement of employees in the political process is encouraged by Noblis, but participation must be on your own time, at your own expense, and using your own resources. Employees may not make political contributions and expenditures on behalf of Noblis or involve Noblis in political activities. Employees must refrain from conducting personal political activities in a manner that might suggest sponsorship or approval by Noblis, including the use of the employee’s Noblis title or Noblis’ name. All correspondence with elected officials must indicate that the opinions expressed are your personal opinions. Additionally, you should avoid even the appearance of lobbying on behalf of Noblis.

GIFTS, GRATUITIES, AND OTHER BUSINESS COURTESES

We win business and select business partners on the basis of the merits of our people, products and services. To avoid even the appearance of impropriety, there are substantial restrictions on the types of business courtesies you may receive from or offer to firms, agencies and persons with whom we do business. “Business courtesies” cover gifts, loans, services, meals, entertainment, unusual hospitality, or other things of value.

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 the Noblis has an interest, or which could affect actions by you, Noblis or a Noblis client. Even if you do not think it would influence your professional conduct, acceptance of gifts may reflect poorly on the integrity of your work and our reputation for objectivity.

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, thing of value, or compensation of any kind. Our policy on kickbacks and bribes is clear: they are illegal and are not allowed.
**FAIR COMPETITION**

Noblis values 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.

**RESPONSIBLE SCIENCE**

Noblis employees are expected to conduct their research with the highest standards of ethics and integrity and report any actual or suspected misconduct, falsification, fabrication, plagiarism or other practices that violate the standard codes of scholarly conduct and ethical behavior in professional scientific research.
FINANCIAL INTEGRITY

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:

• Be clear and accurate in every aspect of our billing and pricing.
• Be cost-conscious when acquiring materials and services for the Company.
• Accurately price products and services.
• Do not split invoices to hide costs or avoid payment procedures.
• Make certain that bills are accurate, prompt, and complete.
• Whenever you are responsible for a payment made by or on behalf of the Company, be sure it is supported by appropriate documentation that describes its purpose.
• Never make or approve 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.
• Take responsibility for the complete accuracy of all cost charges and records. Falsifying records is a serious offense that can result in criminal and financial penalties for the Company and the people involved.
• If you are involved in contract negotiations, make sure that contracts and proposals comply with all applicable laws, regulations, and provisions of existing contracts, and that all statements, communications and, representations to prospective customers concerning the Company are truthful and accurate.
• Never use Company funds or assets for any unlawful or improper purpose, including personal use.

TIME REPORTING

Timely and accurate time reporting of your labor hours and absences is the legal and ethical responsibility of every Noblis employee. Improper time charging may lead to disciplinary action up to and including termination of employment. Employees are expected to know the project code on which they are working. Each employee is required to accurately and honestly report all hours worked after the work has been performed or at the end of the work day, whichever comes later. If you approve a time card for another employee you are responsible for knowing the project code on which the employee is working.

EXPENSE REIMBURSEMENT

It is the personal responsibility of each employee to timely an accurately submit and record their business related expenses in accordance with the Noblis Travel Handbook Procedure. Reimbursements paid to employees using company-sponsored credit cards must be promptly applied to repay any outstanding debt. Employees may not use company-sponsored credit cards for personal expenses.

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Compliance Helpline: 1-844-297-4192 or at ethicspoint.com
CONFIDENTIALITY AND COMMUNICATIONS WITH THIRD PARTIES

NOBLIS AND CONFIDENTIAL INFORMATION

As an employee of Noblis, you may regularly be exposed to a wide range of material, non-public information about Noblis, including proprietary and confidential information. All employees must use reasonable care to protect Noblis’ 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. Whenever you receive an inquiry that would require you to disclose non-public information about Noblis, refer it to your manager, your Mission Area, or Shared Services Director, or the General Counsel. You may not keep any Noblis proprietary information if you leave employment at Noblis and you must continue to maintain the confidentiality of the information even after you leave.

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. In addition, if information received from another company is marked “company-confidential” or has some other kind of similar, restrictive markings, 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.

Employees may not intentionally violate the intellectual property rights of third parties including former employers and must abide by all post-employment restrictions regarding the protection of third party proprietary and confidential information.

PROCUREMENT INTEGRITY AND PROTECTION OF SENSITIVE GOVERNMENT INFORMATION

Every Noblis employee must comply with all aspects of the Procurement Integrity Act which includes a prohibition against (i) knowingly obtaining, other than as provided by law, bid, proposal, or source-selection information related to an ongoing federal procurement and (ii) disclosing bid, proposal, or source-selection information which you have received in the course or providing support or services to a federal government client.

Noblis government clients often provide us with sensitive or classified 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 are responsible for knowing and following government handling requirements. These requirements are described in more detail in the Corporate Security Policy and Corporate Security Operations Plan. You should know that violations could lead to disciplinary action or even dismissal. So handle with extreme care!
INSIDE INFORMATION

No Noblis employee may use any Noblis or third party proprietary or confidential information gained through their employment with the company to further their private interests or for the personal gain or benefit of themselves or any other person or entity.

LICENSED MATERIAL

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

COMMUNICATIONS AND SOCIAL MEDIA

Each employee must apply good common sense and use social media responsibly and safely, in the best interests of Noblis. You are personally responsible for what you communicate in social media. Use good judgment about what you post and remember that anything you say can reflect on Noblis. 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 its business. Certain employees are authorized and encouraged to use social media as part of their job duties, for Noblis’ marketing, public relations, recruitment, 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 the prior authorization of the General Counsel.

The Noblis Corporate Communications Department is responsible for managing all public news releases on social media on behalf of Noblis. 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. All inquiries from the media should be forwarded immediately to the Corporate Marketing and Communications organization.
COMPANY IMAGE AND ASSETS

COMPANY IMAGE

Noblis’ reputation and identity are among its most valuable assets. When representing Noblis, you are expected to conduct yourself in a manner that reflects positively on the Company’s image and identity. Never disparage or misrepresent the Company’s image or the Noblis brand.

COMPANY ASSETS

Noblis 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 and are not abused, misused, misappropriated, or wasted.

COMPANY INTELLECTUAL PROPERTY

During the course of your employment, you may create intellectual property for Noblis or its clients. All intellectual property created during your employment or using Noblis assets or resources belongs solely to Noblis. No personal or pre-existing intellectual property in your possession may be brought to Noblis or used in connection with Noblis work. Noblis’ policy is to identify, maintain, and protect its intellectual property. Employees who have created or developed intellectual property are required to appropriately notify Noblis pursuant to applicable policy.

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 Usage Standards. Noblis information systems must be used for legitimate business purposes. You may not use our information systems for the purposes of:

• Information used to access company information systems, including user IDs, passwords, and building-access key cards;
• Corporate data, and the data entrusted to us by our clients
• Information systems from damage, including both physical and logical damage. Corporate provided security mechanisms must never be disabled or by passed.

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:

1. Noblis information systems are for legitimate business purposes.
2. You should have no expectation of privacy while using any Noblis information resource regardless of time or location of use.
3. 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.
**COMPLIANCE WITH LAWS AND INVESTIGATIONS**

**COMPLY WITH LAWS AND REGULATIONS**

It is important that you comply with all laws, regulations, and required standards that apply to you and the Company’s activities. This Code highlights several of the areas of law that you must understand. But it is by no means exhaustive. There are also laws related to procurement integrity, international transactions, fair competition, and anti-money laundering that you must be aware of and comply with, just to name a few. 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 or the Compliance Office if you have any questions regarding the application or interpretation of any law, regulation, or this Code.

**COOPERATION IN INVESTIGATIONS**

Noblis employees shall 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, destroy or alter any documents or electronic records. The company will comply, to the greatest extent possible, with all government investigation. And, if requested by Noblis, you are also required to fully cooperate with investigations conducted by the government. If you are contacted directly by the government regarding an investigation you must immediately notify the General Counsel.

**Mandatory Disclosure**

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

**Export Control Compliance**

We comply with international trade regulations that prohibit trade with certain countries, organizations, and individuals, or require government authorization for the export, re-export, or transfer of sensitive hardware, technology, or other information.

**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 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.
POLICIES AND PROCEDURES

Policies and Procedures, which relate to the various sections in the Code, are listed below and are found in the QMS. This list is not exhaustive. We can’t stress enough—WHEN IN DOUBT, ASK QUESTIONS!

There’s also training related to various aspects of the business on the Intranet. Complete training related to your job as required, and review training materials periodically to keep requirements fresh in your mind.

CODE OF ETHICS AND CONDUCT
• Noblis Code of Ethics and Conduct Policy

RESPECT IN THE WORKPLACE
• HIPAA Policy
• HIPAA Procedure
• Whistleblower Policy
• Work Environment Policy
• Corporate Security Policy
• Investigations Procedure

CONFLICTS OF INTEREST
• Employment Policy
• Pursuit of Client Work Policy
• Gratuities and Personal Conflicts of Interest Policy
• Personal Conflicts of Interest and Support to Client Acquisitions Procedure
• OCI Procedure
• Employment of Federal Government Employees Procedure

FINANCIAL INTEGRITY
• Time Reporting Policy
• Time Reporting and Leave Procedure
• Travel Handbook Procedure

CONFIDENTIALITY AND COMMUNICATIONS WITH THIRD PARTIES
• Intellectual Property Policy
• Responding to Government Investigations Policy
• Combating Trafficking in Persons Policy
• Combating Trafficking in Persons Procedure
• Public Release of Unclassified Material Policy
• Document Release to Public Procedure
• Responding to Government Investigations Procedure
• Intellectual Property Procedure
• Corporate Security Policy
• Noblis Corporate Security IT Handbook Procedure
• Noblis Corporate Security Operations Plan Procedure

GIFTS, GRATUITIES AND OTHER BUSINESS COURTESIES
• Gratuities and Personal Conflicts of Interest Policy

COMPANY IMAGE AND ASSETS
• Corporate Security Policy
• Social Media Policy
Electronic Information Media Policy
Rules of Behavior and Acceptable Use Standards for Noblis Information and Systems Resources
Intellectual Property Procedure

**COMPLY WITH LAWS AND REGULATIONS**
- Mandatory Disclosure Policy
- Intellectual Property Policy
- Responding to Government Investigations Policy
- Foreign Trade Controls Procedure
- US Foreign Trade Control Compliance Policy
- US Foreign Trade Control Laws Overview Guideline
- Whistleblower Policy – Other Than Intelligence Programs
- Whistleblower Policy – Intelligence Programs

**FORMS**
- Certificate of Acknowledgement – Combating Trafficking in Persons Form
- Exit Procedures Checklist and Proprietary and Confidential Information Developments and Non-Solicitation Agreement Form
- Outside Employment Form
- Public Release of Unclassified Information Form
- Proprietary and Confidential Information, Developments and Non-Solicitation Agreement Form
- Invention Disclosure Form
CONCLUSION

ACKNOWLEDGEMENT AND STATEMENT OF COMPLIANCE

You must acknowledge on an annual basis that you have read and will comply with the Code and the policies and procedures it represents. An acknowledgement statement will be included in the Annual Statement of Compliance required and provided to all current employees. All new employees will be required to sign a similar acknowledgement upon hire.

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 you may be required to take other mandatory trainings by specific due dates.

CHANGES TO THE CODE

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