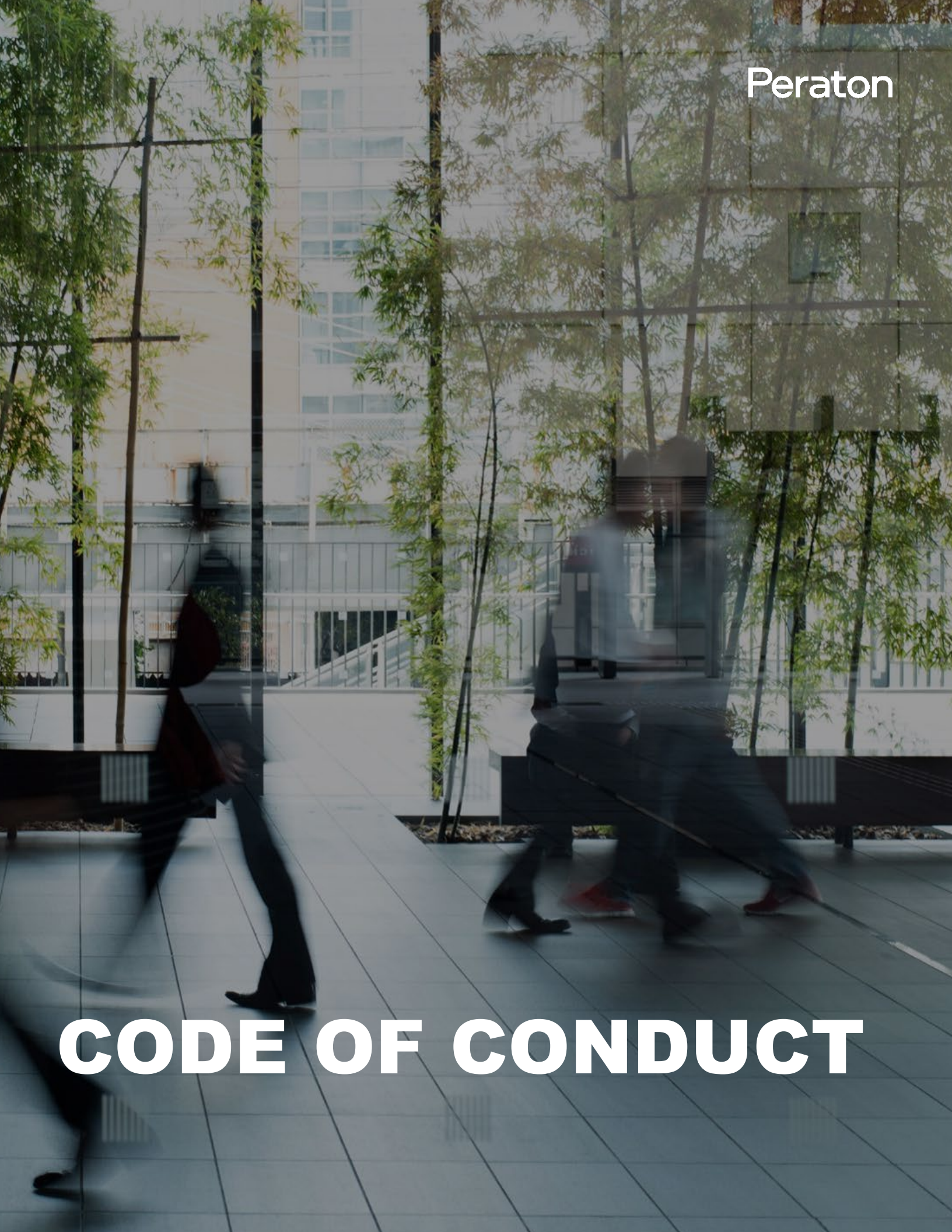

Peraton

CODE OF CONDUCT

TABLE OF CONTENTS

Mission, Vision, Values 3
Responsibilities 4
Mission 5
Employee Well-Being 9
The Company 11
Ethics and Business Conduct 15

The Peraton Code of Conduct (the “Code”) establishes the fundamental standards of business conduct that all individuals and entities who work or act on behalf of Peraton are expected to meet, whether an officer, employee, contractor, or other company representative (“Peraton personnel”). The Code draws upon and embodies the laws, regulations, and company policies that govern business, and it underscores Peraton’s commitment to the highest standards of integrity. Our values and priorities serve to guide the application of our Code to all facets of our business.

2

Our Mission

To protect and promote freedom around the world.

Our Vision

To be the company national security customers consistently rely on to solve their most daunting challenges, to create novel solutions supporting their most vital missions, and to manage their most valued assets.

Our Values

Our values form the most critical foundation for success.

Honor Those We Serve: We do not take lightly the responsibility we have assumed in supporting our national security. Our armed forces—Soldiers, Marines, Sailors, Airmen, Guardians, and Coast Guardsmen— have the courage to show up. What they do for our nation is something bigger than ourselves, and through their services, we will pass on to our children the world's greatest nation, just like the one we got from those who gave so much before them.

Maintain Selflessness for the Team: We give first to the team and expect nothing in return. Team success breeds personal success. We act for the team first, and for individuals, afterwards. Team is the sine qua non of mission and company success.

Operate With Integrity and Trust: We demand trust in every way from our leaders and our employees. From the quality of our services, to the way in which we make decisions, customers and partners must be able to count on our trust. Trust is the currency of leadership, the pulse of a company, and the motto for a nation. We must trust each other, and our customers must trust us.

Treat Others With Respect: We treat each other with courtesy, dignity, and respect. We recognize the value that is generated from different backgrounds and experiences.

Constantly Innovate: We show initiative and creative thinking. We challenge the status quo, embrace change, and solve problems through innovation, agility, and creative thinking. We will engage in open debate, explore novel solutions, and continuously seek to better ourselves.

Deliver Excellence in Value and Capability: We work relentlessly to obtain the highest quality results. We strive for excellence through continuous improvement and flawless execution.

RESPONSIBILITIES

We are individually and collectively accountable for embodying ethics and integrity in everything we do. Seek guidance and report concerns—it's our obligation to our future.

Responsibilities of All Peraton Personnel

- Read, understand, and comply with the Code and Peraton policies.
- Participate in training and educational programs/ events, including mandatory annual training.
- Obtain guidance for resolving a business practice or compliance concern if you are uncertain about how to proceed in a certain situation.
- Report possible violations of the Code, policies, applicable laws, and regulatory requirements through our established channels.
- Cooperate fully in any investigation, audit, or other company review.
- Make a commitment to conduct Peraton business with integrity and in compliance with applicable laws and regulatory requirements.

Additional Responsibilities of Peraton Leaders, Managers, And Supervisors

- **Set the tone** by promoting our values and Code, maintaining a professional work environment taking steps to detect and/ or prevent improper conduct, and refraining from retaliatory behavior.
- **Model ethical behavior** by demonstrating integrity, treating employees fairly and with no discriminatory or preferential bias, treating others with respect, and ensuring that employees are not pressured to compromise Peraton policies or the law.
- **Foster an open, ethical culture** where employees are encouraged and feel comfortable to speak up, ask questions, and report behavior that is inconsistent with our values, Code, and other policies, without fear of retaliation.
- **Ensure employee concerns are addressed in** a timely manner and required compliance training is completed when due.

WORKING WITH THE GOVERNMENT

Peraton maintains professional and ethical relationships with all government customers—U.S. Foreign, State, and Local. We are vigilant in ensuring we comply with the complex body of laws, regulations, and contract requirements.

Procurement Integrity

Peraton competes fairly and protects the integrity of the government procurement process. We:

- Obtain competitive information only through fair and legal methods
- Do not solicit or knowingly obtain protected source selection information or competitor bid and proposal information
- Screen current and former government officials seeking employment with Peraton, particularly those with involvement in procurement activity

Accurate Reporting and Charging

Peraton personnel must report and charge all costs, including their time, in an accurate, complete, and timely manner. This includes:

- All items related to cost, including work hours performed and labor, travel, material, and other costs
- All correspondence, including invoices, representations, certifications, statements, and other communications
- Bids and proposals
- Claims and disclosures

Government Property

Peraton controls, protects, preserves, and maintains government property appropriately and upholds our responsibility and accountability for all government property.

False Statements and Claims

The submission of false claims and false statements to a government is strictly prohibited and subjects the originator to serious criminal and civil sanctions. For example, the U.S. has a statute called the False Claims Act, which prosecutors use to combat fraud by government contractors.

The False Claims Act, like the laws of many countries, imposes liability on any person who submits a claim to the government that they know (or should know) is false. The False Claims Act also imposes liability on an individual who submits a false record in order to obtain payment from the government. A third area of liability includes those instances in which someone falsely certifies the type or amount of property to be used by the government.

Anti-Corruption: Bribes, Kickbacks, and Fraud

Peraton complies with anti-corruption (bribery, kickbacks, and fraud) laws that govern our operations in the countries in which we do business. Peraton personnel and our representatives are prohibited from offering, paying, promising to pay, or authorizing the provision of anything of value to a government official or any private party with respect to company business. All Peraton accounts, books, and records must be accurate and complete, and all expenses fully and accurately described and entered. Off-book accounts or transactions are strictly prohibited.

Peraton personnel are required to be vigilant in ensuring that all dealings, transactions, or business courtesies involving third parties (whether or not a government or public official) are reasonable, lawful, and fully justified under the circumstances, and that all such dealings, transactions, or business courtesies do not create even the appearance of impropriety or the risk of being misinterpreted as an attempt to gain an improper business advantage.

Gifts and Gratuities

Gifts to Government Customers: Peraton adheres to very strict gift rules when dealing with government officials or government entities. As a general matter, Peraton has zero tolerance for any business courtesies provided by or to any government official. Any exception must be approved in advance in writing by the Peraton Legal Department.

Other Business Courtesies: Peraton appreciates that the exchange of business courtesies foster and celebrate business successes, but we ensure they do not improperly influence decision-making or give the appearance of impropriety.

When receiving business courtesies, Peraton personnel may:

- Not requesting or accepting business courtesies with an agreement to do anything in return, particularly when involved in contract solicitation or negotiations
- Only accept business courtesies consistent with reasonable marketplace customs and in compliance with Peraton ethics and compliance policies
- Never accept cash or cash equivalents, such as gift cards
- Never accept a gift or business courtesy without reviewing applicable policy and obtaining the prior written approval of the Legal Department, as applicable
- Decline or return inappropriate business courtesies, or if they cannot be returned, turn them over to the Legal Department for further instruction

When providing business courtesies to customers (other than government customers), regardless of local law or custom, Peraton personnel must:

- Provide business courtesies in connection with a bona fide and legitimate business purpose
- Follow applicable policy and Legal Department guidelines and process
- Accurately record all related transactions (e.g., reflect in expense reports)
- Not offering or providing business courtesies of excessive value (extended trips, electronic equipment, designer brands, events, or outings)
- Ensure the business courtesy conforms to company policy and is pre-approved by the Legal Department, when required

Working With Third Parties

All company representatives, or other third parties, must be engaged in accordance with Peraton procurement policies and procedures. Employees must seek advice from Peraton's Legal Department prior to engaging an international or domestic consultant. Peraton will not engage a third party to engage in activity that would be prohibited by Peraton policies. Specifically, no consultants, representatives, or other third parties may pay bribes or kickbacks, engage in industrial espionage, obtain third-party proprietary data without authority, or improperly gain inside information or influence.

Organizational Conflicts of Interests

Peraton requires all personnel to comply with the U.S. government organizational conflict of interest (OCI) rules that prohibit Peraton and its personnel from serving in conflicting roles that may bias our judgment, impair our objectivity, or otherwise create an unfair competitive advantage. Peraton personnel are responsible for identifying and reporting OCIs.

Potential OCIs may arise in these, and other, situations where Peraton personnel:

- Access confidential information belonging to or originating from other companies and/or nonpublic or source-selection information belonging to or originating from the government if such access potentially provides Peraton with an unfair competitive advantage (Unequal Access to Information OCI)
- Directly or indirectly develop or otherwise contribute to government solicitations, specifications, or statements of work if Peraton has potential business interests in such solicitations, specifications, or statements of work (Biased Ground Rules OCI)
- Directly or indirectly provides the government with guidance or advice with regard to future government procurement policies or strategies that potentially could affect Peraton business interests (Biased Ground Rules and/or Impaired Objectivity OCI)
- Directly or indirectly evaluates or reviews—for the government, contractor program performance, or solicitation submissions—if Peraton has potential business interests related to such programs or solicitations (Impaired Objectivity OCI)
- The Legal Department must review and advise on all situations that involve potential OCIs.

U.S. International Trade, Anti-Boycott, and Sanctions

Peraton requires all personnel to comply with U.S. laws, rules, and regulations governing the import, export, re-export, and transfer of hardware and technology, including software and technical data. We adhere to these laws and regulations, which apply to exports of hardware, software, or technical data to locations outside of the U.S., even when they are shipped to U.S. government facilities and/or personnel. Additionally, we must obtain export authorizations for the transfer of controlled information and services to foreign persons, regardless of location.

In addition, Peraton adheres to other laws and regulations prohibiting participation in foreign boycotts not sanctioned by the U.S. government. We strictly prohibit personnel from agreeing to support or comply with boycott activities not approved by the U.S. government. Any request to refuse to deal with potential or actual customers or suppliers, or otherwise participate in a foreign economic boycott, or provide information related to a boycott request, must be immediately reported to the Legal Department.

Peraton is committed to compliance with U.S. trade and sanctions regulations and, accordingly, maintains a company-wide trade compliance program. The Peraton Legal Department, and specifically its trade compliance team, maintains responsibility for overseeing compliance throughout the company and responding to trade-related inquiries.

Anti-Trust and Competitive Practices

Peraton believes that fair competition and open and fair bidding are fundamental to ensuring the best prices and service for our customers. We compete vigorously, independently, and ethically, and we avoid any marketing, advertising, or other program that could be characterized as unfair or deceptive. Peraton will not collude with, or otherwise enter into any agreement or understanding with, any competitor or potential competitor in these areas:

- Price or discounts
- Profits, profit margins, or costs
- Market share
- Bids, the intent to bid, or not to bid on specific programs or multiple programs
- Selection, classification, rejection, or termination of management agreements
- Sales territories or markets
- Exchange of competitive information

- Employee salaries or other terms of compensation
- Restrictions on solicitation or hiring of each other's employees
- Any matter inconsistent with Peraton's complete freedom of action and independence

The foregoing is not meant to prohibit legitimate teaming arrangements with competitors, including narrowly tailored non-solicitation provisions, provided the arrangements are fully disclosed to, and approved by, the Legal Department.

EMPLOYEE WELL-BEING

We treat each other with courtesy, dignity, and respect. We engage in open debate, explore novel solutions, and continuously seek to better ourselves

Recruitment, Vetting, and Selection

Peraton maintains a culture of ethical conduct; all personnel should embrace the importance of business integrity and commitment to adhere to applicable standards of conduct and the law. Peraton considers these to be key considerations in selecting and retaining company representatives. Peraton carefully screens individuals who may work with our company to protect our ethical and professional culture. Peraton professionals who are responsible for hiring employees or engaging contractors must comply with Peraton's policies and procedures regarding background screening and performance record evaluations when making hiring decisions.

Recruiting and Hiring Government Personnel

Peraton takes pride in the fact that many of our employees are former government employees or members of the armed forces. We value their expertise and skill. When we recruit current and former government employees, we recognize that certain laws and regulations may restrict the activities these individuals can perform after leaving government service.

Current and former government employees must be screened to identify any post-employment restrictions that might impede an applicant's ability to perform work for the company. In addition, current government employees applying for a position with Peraton must affirm that they comply with their ethical obligations in seeking outside employment.

Human Rights

Peraton protects and advances human dignity and human rights. We promote and comply with all human rights laws and standards, and we will not tolerate the practice of trafficking in persons in any form. This includes, but is not limited to, procurement of commercial sex acts such as prostitution or the use of forced or child labor. In addition, we prohibit fraudulent recruiting and employment practices, such as charging recruiting fees, denying access to an employee's identity or immigration documents, failing to disclose key terms and conditions of employment, and failing to provide return transportation from international and remote assignments.

Impact

Peraton values different experiences and innovation, which strengthens our company and enhances our competitiveness. Peraton expects our employees and representatives to treat each other with respect and to appreciate other backgrounds and cultures. We maintain a strong concern for individual dignity and well-being.

Equal Opportunity

Peraton is committed to providing a fair, collaborative, and productive working environment for all employees. We expect managers—who are charged with front-line responsibility—to enforce the intent, as well as the letter, of all applicable employment-related laws, regulations, and policies. Employment decisions at Peraton are based on an individual's capabilities and qualifications. Peraton will not tolerate discrimination based upon race, color, religion, sex, national origin, age, disability, status as a protected veteran, or any other characteristic protected by federal, state, or local law.

Harassment

Peraton is committed to providing a professional work environment that is free of harassing, coercive, abusive or disruptive behavior. Harassment based on race, color, religion, sex, national origin, age, disability, status as a protected veteran, or any other characteristic protected by applicable federal, state, or local law will not be tolerated at Peraton. This prohibition applies to harassment based on any of these protected categories, including sexual harassment, by supervisors, co-workers, managers, contractors or any third party who does business with Peraton or any applicant, employee, intern, volunteer, contract worker or any other person working on behalf of Peraton.

This prohibition applies in any business-related setting or Peraton-sponsored event, whether off work premises or after regular work hours. Peraton prohibits retaliation against any individual who, in good faith, reports concerns of harassment, known or perceived violations of the law, this Code, corporate policies, or other conduct harmful to the company's best interests.

Environmental, Health, and Safety

Peraton values a safe, healthy workplace, which results in our strict adherence to environmental, health, and safety policies and to reporting any injuries, safety, or environmental issues to the appropriate parties.

Workplace Violence

Peraton is committed to a workplace free of violence. The following must be immediately reported to Security, management, or Human Resources:

- Threats or actual violence
- Stalking or other forms of intimidation
- Destruction or attempted destruction of property
- Domestic violence affecting the workplace
- Unauthorized possession of weapons in the workplace

Drug-Free Workplace

Peraton maintains a drug-free workplace and requires all Peraton personnel to comply with our drug and alcohol policies as a condition of employment.

Accordingly, we prohibit:

- Unlawful manufacture, possession, or distribution of illegal drugs
- The illegal use of drugs, including prescription medication
- The presence of illegal drugs or their respective metabolites in any specimen of Peraton personnel taken and screened pursuant to Peraton policy, procedure, or practice
- The abuse of alcohol or illegal drugs in the workplace

THE COMPANY

We exist as a company to deliver our talent and capabilities. We will always act ethically and responsibly on behalf of the company while we further our customers' missions and manage our employees who support them.

Our Stakeholders

We accept and embrace our fiduciary responsibility to maximize our financial returns to our investors. We will be conservative in our investments, and focused in our development of capital to ensure maximized returns.

Use of Company Resources

Peraton's company property, software, equipment, or other resources may not be used for noncompany business. Peraton may provide electronic resources to its personnel, including telephone, internet, and email communications to expedite necessary business communications and serve as a Peraton resource. Personnel may use Peraton communications in a limited personal capacity. However, these communications are not private, and all electronic and telephonic communication systems and any information transmitted by, received from, or stored therein or thereon is the sole property of Peraton.

Peraton personnel do not have a right of privacy regarding any information that is stored or transmitted over any Peraton information system, including email, voicemail, or internet. Peraton has the right to, and does, monitor such communication systems. Passwords or delete functions do not create any right of privacy and will not limit Peraton's ability to monitor, intercept, or otherwise be privy to electronic or telephonic communications.

Peraton employees are responsible for adhering to acceptable use protocols and protecting company resources and assets provided by our customers against unauthorized access, misuse, damage, loss, or theft. Never share passwords and do not install unauthorized software or hardware. Secure computers, cellphones, and removable media, and report any potential cyberattacks, loss, theft, or improper use to Security.

Accurate Books, Records, and Submissions

Peraton fully complies with generally accepted accounting principles and with all record retention requirements imposed under customer contracts, national, state, provincial, and local laws and regulations. No false or misleading entries may be made or caused in any company books, records, or reports for any reason whatsoever. Personnel must not improperly destroy, improperly alter, make false entries, or willfully fail to make correct entries on any company documents or records.

Records Retention

Peraton complies with our company standards relating to the retention, safeguarding, and disposition of records, including electronic records. All personnel should regularly review standards as well as those records in their custody or control and delete or otherwise dispose of those records that are no longer required. It is unlawful to destroy, conceal, alter, or falsify any record to obstruct or influence any lawsuit or other legal, regulatory, or government proceeding or investigation.

Personal Conflicts of Interest

Peraton requires personnel to avoid situations where their personal interests could conflict with company interests.

Conflicts of interest arise when an individual's position or responsibilities present an opportunity for personal gain separate and apart from the direct rewards of their employment or contractual relationship with Peraton, or when a person's personal interests are inconsistent with those of Peraton and could lead to that person's responsibilities to Peraton being compromised.

Common examples of actual or potential conflicts include an employee who has or is seeking to enter:

- Secondary employment in addition to the individual's role with Peraton
- A personal or financial interest, or a family member with an interest, in any transaction involving Peraton, whether or not the transaction may be considered adverse to Peraton
- An ownership or other material financial interest in a company that is a customer, competitor, or supplier
- A close, personal relationship with a subordinate employee
- Service on an outside company, nonprofit, or other organization's board or advisory council
- A run for political office

When any potential conflict exists, individuals must disclose this in advance to the Legal Department during employee onboarding or via Peraton's Conflict of Interest reporting site, so the company may determine if the activity posing the conflict will be permitted or prohibited.

Dealing With Suppliers

All purchases and contracts negotiated for third-party services or goods shall be made exclusively on the basis of price, quantity, service, and ability to meet the company needs. Personnel must maintain honest and straightforward relationships with suppliers.

All suppliers and other third-party associates are subject to a due-diligence process, during which their suitability and eligibility to provide services is measured against a comprehensive assessment of risk to Peraton and our customers.

All entities that meet the company's requirements must formally attest to their commitment to comply with Peraton's Code through the contracting process.

Privacy

Peraton requires all personnel to comply with all privacy laws and regulations, as well as privacy-related customer contract requirements, including those applicable to personally identifiable information (PII) and protected health information (PHI). All personnel must:

- Comply with all obligations and commitments made to individuals when collecting their PII/PHI
- Limit collection, use, storage, and access of PII/ PHI to the minimum level reasonably necessary to perform the related authorized business activities
- Provide administrative, physical, and electronic safeguards for all PII/PHI under your control for authorized business activities
- Dispose of PII/PHI as soon as legally and contractually permitted
- Report immediately any suspected data breaches or losses to the Legal Department and Security Department
- Direct any questions about privacy to the Legal Department

Insider Trading

Peraton personnel may not engage in insider trading. Insider trading involves the buying or selling of securities with material nonpublic information. Material nonpublic information is information that is not available to the general public and that a reasonable investor would consider important in deciding whether to buy or sell a security.

Political Activities

We participate in the political, legislative, and regulatory process responsibly to represent Peraton's diverse business interests. Laws governing lobbying, gifts, and political contributions are complex. Even unintended violations can have business, reputational, and corporate consequences. We follow Peraton policy and the law concerning the political process in all countries where we do business. We have compliance measures and internal controls designed to ensure Peraton's political activities remain compliant.

Peraton has a Political Action Committee (PAC), which operates in accordance with federal law and is solely funded by voluntary contributions of eligible employees. We encourage Peraton employees to participate in the Peraton PAC, if eligible.

We encourage employees to participate on their own time and at their own expense in civic affairs and the political process, including supporting political parties and candidates of their choosing. Note, political activities should not be conducted at Peraton or customer facilities, and Peraton employees should engage in such activities in their personal capacity and not as representatives of Peraton.

Communications and Social Media

Peraton does not allow personnel to represent the company in publicly disseminated communications, written or oral, that may harm Peraton's reputation or business or community relations, or in a manner otherwise inconsistent with our standards. Peraton does not authorize personnel to engage in forms of externally facing communications that identify Peraton, speak on behalf of, or communicate as an employee or representative of Peraton without the prior approval of Peraton, nor are personnel authorized to publicize, make statements, or give information related to Peraton or any of its activities or comment on the plans and activities of Peraton customers to the news media without Peraton's prior approval.

Inquiries from any representative of the news media, under all circumstances, must be referred immediately without comment directly to the Peraton Marketing and Communications Department. Such a referral will ensure appropriate coordination and review by the company's executive officers of any public statements to the news media attributable to Peraton.

Personal Conduct Outside the Workplace

Peraton employees are expected to uphold the highest standards of integrity and be accountable for their personal and professional conduct inside and outside the workplace. This includes refraining from criminal activity or other misconduct while off duty that can adversely impact Peraton's reputation and/or erode our customers' trust.

Security

We are individually and collectively accountable for the protection of our workforce, customers, intellectual property, brand/reputation, and facilities. Peraton expects all personnel to report any security concerns to Security, management, Human Resources, Legal.

Insider Risk

In accordance with U.S. government requirements, Peraton has established an insider risk program (IRP) to detect, deter, and mitigate insider threats. The IRP seeks to protect Peraton and the U.S. government from harm, degradation, or loss of information, resources, or capabilities resulting from data theft, espionage, fraud, sabotage, unintentional incidents, and workplace violence. All Peraton employees are expected to recognize and report concerning behavior that may indicate a co-worker needs assistance, or who may present a threat to themselves, their co-workers, or the organization.

Security Clearances

Security clearances are a privilege, not a right. Cleared employees are obligated to report adverse information that negatively reflects on the integrity or character of a cleared employee, suggests that his or her ability to safeguard classified information may be impaired, or that his or her access to classified information may not be in the interest of national security.

Safeguarding Proprietary and Customer Information

Peraton personnel must secure and protect intellectual property (IP), proprietary, customer, and otherwise sensitive information by adhering to data classification and handling requirements. Personnel must observe obligations of confidentiality and nondisclosure of proprietary and confidential information, IP, and trade secrets of Peraton and others, including customers, suppliers, and former employers.

Peraton proprietary information (e.g., financial, personnel, technical, or business information that has not been authorized for public release) or customer information shall not be transferred to personally owned devices, personal email addresses, or unauthorized cloud services or storage solutions. Any personnel who receive proprietary information belonging to a supplier, customer, or competitor without proper authorization, must immediately bring it to the attention of the Legal Department. All Peraton personnel must immediately report, in writing, all identified vulnerabilities within, or unauthorized access of, any Peraton IT system or IP to their direct supervisor and the Legal Department.

Intellectual Property

Peraton recognizes that it is both illegal and unethical to engage in practices that intentionally violate the IP rights of others. The willful infringement or misappropriation of these IP rights is strictly prohibited. All Peraton personnel are required to refrain from using or distributing unauthorized copies of any copyrighted materials. Personnel shall not use or disclose any proprietary information of third parties or of the company, except in the course of employment and always in strict accordance with the terms upon which the proprietary information was received, including the terms of any applicable nondisclosure or other agreements executed by Peraton.

Any proprietary information contained in writings, graphics, computer code, or any other form shall be safeguarded from disclosure to unauthorized persons and shall be removed from company premises only as needed for company business.

Peraton owns any IP created by Peraton employees during the course of their employment at Peraton, including patents, copyrights, trademarks, and trade secrets. Although employees may have personal or pre-existing IP created outside of their Peraton employment, no such outside or pre-existing IP may be brought into Peraton, disclosed to Peraton personnel or Peraton customers, or incorporated into a Peraton work product without prior written approval of the Legal Department. Employees who take such actions with their outside or pre- existing IP without prior written approval are deemed to have granted a broad license to Peraton and its customers in that IP.

ETHICS AND BUSINESS CONDUCT

At Peraton, we want to uphold the highest standards of integrity, and we want to do more than comply with laws and regulations.

Making the Right Choice

Striving to be the best in everything we do means we each have a responsibility to help shape our culture through our personal commitment to meet the highest ethical standards in all we do. Codes and policies alone cannot create a company-wide ethical culture where we all value each other and do business with the highest level of integrity.

If you are faced with a difficult decision, ask yourself the following questions:

- Is it the right thing to do?
- Will my actions be consistent with the Code and the law?
- Am I aware of all the relevant facts, and have I considered all options?
- Will I feel proud and comfortable telling others about the choice I made?
- What will my family and friends think of me?
- What impact will my action have on my customers, suppliers, and other employees?
- Will my action result in embarrassment to myself?
- What impact will my action have on me?

If you are still unsure of what to do, continue to seek guidance from your manager, the Legal Department, Human Resources, or Security. Do not hesitate to reach out to the various resources available to you until you have the information you need to make the right choice.

Seek Guidance, Raise Concerns

Peraton expects personnel to comply with the text and intent of the Code and promptly report any suspected violations through one of the available reporting channels. Confirmed Code violations will result in disciplinary action, up to and including termination of employment and referral to appropriate governmental authorities.

Zero Tolerance for Retaliation

Speaking up to report questionable conduct protects the ethical work culture we value as employees, and it protects our company. Peraton expects that all concerns raised will be treated confidentially and does not tolerate retaliation against any personnel who speak up honestly and in good faith.

Cooperation in Investigations

Peraton personnel are required to cooperate with all internal reviews, audits, investigations, and corrective actions. Peraton personnel must never destroy or alter any documents or electronic records; lie to or mislead an investigator; or obstruct the collection of information relating to an investigation, litigation, or audit.

To the greatest extent possible, Peraton cooperates with government agencies responsible for investigating suspected violations of the law. Peraton personnel may be required to cooperate with investigations, audits, or reviews conducted by the government. You must notify the Legal Department immediately if you learn that a government or third-party agency is conducting an investigation or asking for information pertaining to a suspected violation of the law.

About the Legal Department

Peraton's ethics and compliance program affirms and emphasizes our commitment to ethical conduct. The Legal Department oversees the company-wide ethics and compliance program, and serves as an independent resource for information, advice, and resolution of problems and issues.

The Legal Department maintains the confidential Peraton ethics helpline to ensure investigation into alleged violations of the Code or other Peraton policies.

You are encouraged to reach out to the Legal team whenever you have a question or concern that cannot be readily addressed within your work group or through your manager.

Where to submit Ethics and Compliance Concerns

Ethics helpline: 844.800.3721

EthicsPoint website: peraton.ethicspoint.com

Anonymous reports may be made through the ethics helpline or the EthicsPoint website.
The helpline, maintained by EthicsPoint, is available 24 hours a day, 365 days a year.

Peraton

ABOUT PERATON

Peraton is a next-generation national security company that drives missions of consequence spanning the globe and extending to the farthest reaches of the galaxy. As one of the world's leading mission capability integrators and transformative enterprise IT providers, we deliver trusted, highly differentiated solutions and technologies to protect our nation and allies from threats across the digital and physical domains. Peraton supports every branch of the U.S. Armed Forces, and we serve as a valued partner to essential government agencies that sustain our way of life. Every day, our extraordinary employees solve the most daunting challenges facing our customers. Visit Peraton.com to learn how we're safeguarding your peace of mind.

© 2026 Peraton | Last Updated: July 2026