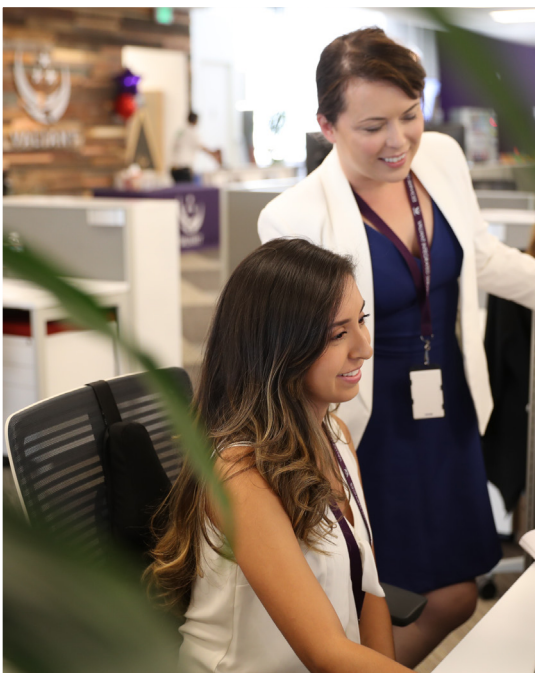




**VALIANT**  
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# CODE OF BUSINESS ETHICS & CONDUCT





## Our Core Values



### INTEGRITY

Honesty, trust, and respect in every situation.



### EXCELLENCE

Performance, effectiveness, quality, and safety in everything we do.



### INNOVATION

Embracing new ideas and best practices in every service that we provide.

**We are Valiant.** Our commitment is to be the best at what we do while never compromising on integrity.

Integrity means doing the right thing all the time, in every situation, regardless of who is watching. It means being trustworthy and reliable. It means choosing to do the right thing even when others are not.

Valiant employees come from many different backgrounds, beliefs, and cultures. Our, Code of Business Ethics & Conduct (the “Code of Conduct” or the “Code”) creates a common understanding of what it means to work with integrity. Our Code applies to all employees of Valiant Integrated Services and its affiliated companies (“Valiant”).

# A MESSAGE FROM DAN CORBETT



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Team Valiant,

Since our inception in 2017, Valiant has been guided by a commitment to ethics, integrity, and inclusion. The Valiant Code of Business Ethics and Conduct is rooted in these values and provides a framework for how we conduct ourselves with our customers, partners, suppliers, communities, and fellow employees. While our work takes us to complex regions worldwide and presents us with challenging scenarios, that is never an excuse or a reason to compromise on integrity. Even though doing the right thing isn't always easy, our mission and values are clear – to empower the world's most critical missions with integrity, excellence, and innovation.



Being a company that does business with integrity means that our customers can always trust us to get the job done and do it the right way. This commitment enables us to keep our customers and to win new business. Valiant is known for being trustworthy and conducting our business the right way, and we want to maintain this reputation as we continue to grow. Building such a reputation can take years to achieve, but only one second – one incident – to lose. Every day, we must show our customers that we continue to deserve their trust by having the courage always to choose the path of integrity, even when it's challenging.

Every Valiant employee must contribute to this goal. If you are faced with a situation and unsure of the proper course of action, I encourage – and empower – you to ask questions. Talk with your manager, Human Resources, Legal, or the Ethics and Compliance Department. Make sure you understand our Code of Conduct and policies and how they apply to you. These resources are designed to provide you with the information you need to do your job with the utmost integrity. Please use them as guides during your time with Valiant, and don't hesitate to reach out with any questions or concerns.

Be Valiant,

Dan Corbett CEO  
Valiant Integrated Services



# WE WORK TO CREATE A CULTURE OF INTEGRITY



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## As employees, we each have the following responsibilities:

- To always act with integrity, regardless of the situation. The end result or “cultural norms” do not justify a lack of integrity.
- To understand the Code of Conduct and how it applies to us in our role, and to promptly complete annual ethics training.
- To ask questions when we have concerns or need guidance.
- To cooperate with reviews and investigations, including internal assessments, independent audits, and other inquiries.
- To comply with all laws and regulations that apply to Valiant. We adhere to both the letter and spirit of the law.
- To comply with all applicable company policies, procedures, systems, and processes.
- To report to Human Resources if we are charged with or convicted of a crime.
- To convey good faith reports of potential or actual violations of the Code of Conduct or other policies to your manager, Human Resources, Legal, or the Ethics and Compliance Department.

## Managers are in a leadership role and therefore have additional responsibilities for creating a culture of integrity:

- To support the Ethics and Compliance Department, such as assisting with training and relaying communications.
- To lead by example, and take steps to detect and report improper conduct, including any retaliatory behavior.
- To create a team environment where ethical conduct is recognized, valued, and exemplified and employees can ask questions and raise issues and concerns without fear of retaliation.
- To discuss Valiant’s ethics program with all direct reports and ensure they are aware that they must comply with the ethics program or face disciplinary action.



## Making the Right Choice

We start by asking ourselves the following questions about the situation:

- Is it the right thing to do?
- Would my decision conflict with Valiant's Core Values or the law?
- What would be the consequences of my decision?
- How would I feel explaining my decision to colleagues or external authorities?
- How would my actions look in the global press?

When it's not always clear what the right thing to do is we speak with our manager, Human Resources, Legal, or the Ethics and Compliance Department.

We take acting with integrity very seriously. Confirmed violations of the Code of Conduct or other Valiant policies will result in disciplinary action, up to and including termination of employment and referral to appropriate governmental authorities.

### We do not Retaliate

We recognize that it takes courage to raise a concern. We have zero-tolerance for retaliation, direct or indirect, against an individual who made a report in good faith.

## Cooperation in Investigations

Valiant employees must cooperate with all reviews and investigations, including internal assessments, independent audits, and other inquiries. While we expect our employees to cooperate fully with reviews and investigations, we recognize that employees are entitled to certain individual protections provided by law, including those regarding data privacy.

If we receive an external inquiry or request for information, we contact Legal immediately.

## Ethics and Compliance Department

The Ethics and Compliance Department serves as an independent resource for information, advice, and resolution of questions and concerns.

### How to contact the Ethics and Compliance Department:

**Email:** [ethics@onevaliant.com](mailto:ethics@onevaliant.com)

### Integrity Hotline:

[www.valiant.ethicspoint.com](http://www.valiant.ethicspoint.com) or by dialing the number listed on the local notice board.

Anonymous reports may be made through the Integrity Hotline. The Hotline, managed by EthicsPoint is available 24 hours a day, 365 days a year and is available in multiple languages.

# WE TREAT EACH OTHER WITH RESPECT AND DIGNITY



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## We celebrate diversity:

- We have an equal employment opportunity workplace that ensures employees and applicants are treated equally and in accordance with applicable labor laws.
- We always treat our colleagues with respect, in and out of the workplace.
- We don't joke in an offensive manner.
- We are aware and considerate of cultural differences.
- We have a harassment-free and bullying-free work environment and have zero tolerance for harassment and bullying in the workplace.

## We value security, health, and safety:

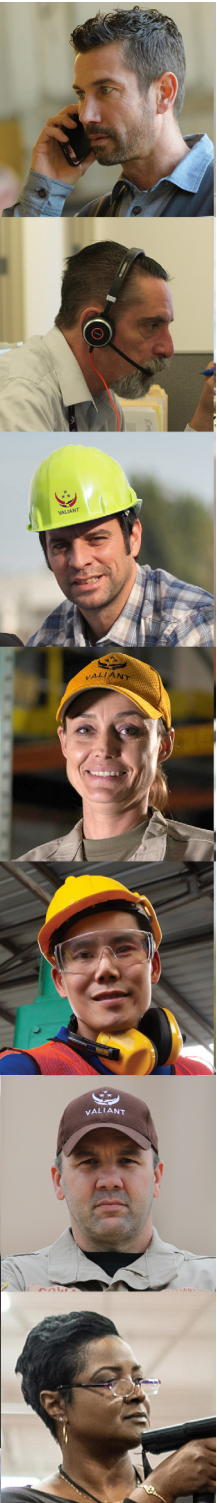
- We strive to have a safe and secure workplace. This includes:
  - Reading and following any security plans for our working location. Contact the Security Department for further information.
  - Reporting any health and safety concerns promptly to the Safety team.
- We do not text while driving.
- We report any health or medical welfare concerns to the appropriate medical manager or Human Resources for confidential evaluation and assessment.

**We do not use, possess, or distribute illegal drugs at work, operate under the influence of any substance, or abuse legal drugs.**

**We respect and protect employee privacy at all times.  
We comply with applicable data privacy laws.**







## We take care of company assets:

- We safeguard Valiant property, including intellectual property.
- We use company time in the appropriate manner. We do not carry out non-Valiant work or solicit non-Valiant work by using the company's equipment or time. We record our time completely and accurately.
- We are vigilant against theft.
- We properly use company and customer equipment, such as mobile phones and laptops.
- We have zero tolerance for using Valiant's property to access or download prohibited material.

### FAQ

#### **My colleagues make jokes in a way that is offensive in my culture. Should I do anything about this?**

**Yes.** If you're comfortable doing so, you can first speak to your colleagues and politely explain to them that the particular style of joking is offensive in your culture. If they are dismissive of your concerns, or if you are not comfortable discussing your concerns with your colleagues, you can raise the issue with your manager, Human Resources, Legal, or the Ethics and Compliance Department, as this type of behavior contradicts the Code, may conflict with other policies, and does not create a healthy working environment.





## We recognize that we are ambassadors of Valiant.

- We know that our individual behavior says something about the way the company works. We endeavor to align all our actions with Valiant's Core Values and policies.
- We are aware that this also includes what we do and say on social media.
- Unless our role specifically requires it, we do not issue statements on behalf of the company.
- We do not contribute company funds for political purposes.

## We compete fairly

- We obtain competitive information through fair and legal methods, and will never solicit or knowingly obtain protected information of the government or our competitors

## We protect our confidential information and information belonging to others.

- If confidential information belonging to others improperly comes into our possession, we do not share it with others, and we report it to the Ethics and Compliance Department immediately.
- We do not use nonpublic information for personal gain.
- We understand that as an employee, we have access to trade secrets and other non-public confidential and proprietary information. We are expected to maintain and protect, for the benefit of Valiant, all confidential and proprietary information we obtain while employed by Valiant, and to refrain from divulging or using such information
- If there is an unauthorized disclosure or compromise of confidential information, including cyber incidents, whether intentional or unintentional, we report it immediately to Legal and the IT Department.

## We do not engage in giving or receiving any form of bribe, kickback, or facilitation payment and understand that engaging in such behavior is a serious violation of the law.

## We keep complete, accurate, and fair records of all our business transactions.







## FAQ

**In the country where I work for Valiant, it is customary to make small “extra” payments to ensure that visas are given, items clear customs, car inspections are passed, etc. As this is standard practice here, is it allowed?**

**No.** Regardless of the circumstances, it is never acceptable to make these types of payments, otherwise known as facilitation payments or bribes.

Not only does making these payments contribute to a cycle of unfair business, it is also illegal and could lead to the prosecution of the company and the individuals involved. If you are in a situation where you cannot carry out business for Valiant without making these payments, do not make the payments and contact the Ethics and Compliance Department immediately.

**Note:** You cannot use a consultant, representative or other third party to engage in conduct that would be prohibited under Valiant’s policies or procedures.

**If I don’t pay a bribe, we’ll lose business to our competitors. What should I do?**

It is never acceptable to engage in an unethical or illegal activity. If you believe that Valiant will suffer a business disadvantage as a result of the unethical actions of others, report this to the Ethics and Compliance Department.

**The records in my department are not maintained, but they aren’t financial. Is this ok?**

**No.** All company records must be maintained in line with the company’s policies and procedures, regardless of whether they are financial.

**We are vigilant against fraud and theft. We understand that fraud can include, but is not limited to:**

- Submitting false expense reports
- Forging or altering checks
- Improperly charging costs in a manner not supported by the relevant contract
- Making a false statement or certification in support of a claim on a government contract
- Stealing from Valiant or a third party or misusing company property
- Unauthorized handling or reporting of transactions.

**We are mindful of the gifts we give and receive.**

- The gifts we give and receive are small and customary, guided by our policies, accurately documented, and never contingent on the actions of the recipient or giver. When in doubt, we ask the Ethics and Compliance Department if the gift is permissible.

**We avoid conflicts of interest in our work, and we disclose to our manager and the Ethics and Compliance Department any situation in which an employee’s personal interest may conflict, or be perceived to conflict, with their obligations to Valiant.**



**We comply with all laws and regulations in seeking, negotiating, and performing government contracts.**

**We properly record and charge our costs.**

- We do not charge unallowable costs, inaccurately complete employee timecards, charge unsupported overhead costs, incorrectly classify costs, shift costs between contracts, inaccurately represent costs in invoices or billing records, or make any other misrepresentations or omissions regarding costs.

**We do not make false statements or fail to disclose pricing data, relevant technical data, and cost accounting practices to our customer during the negotiation of contracts.**

- We do not pay contingent fees to individuals or agencies to obtain government contracts.
- We do not “buy in” to government contracts at artificially low bids expecting to increase the value of the contract through subsequent change orders or follow-on contracts.

**We comply with all applicable laws, rules and regulations governing the import, export, re-export and transfer of hardware and technology, including software and technical data.**

- We comply with U.S. sanctions and prohibitions on participation in foreign boycotts.

**We choose suppliers and subcontractors who act with integrity.**

- We will not employ or enter into a business relationship with any person or entity listed by a Federal Agency as debarred, suspended, or proposed for debarment by the U.S. Government.

**We avoid or mitigate any actual or perceived organizational conflicts of interest.**

**We are fair and impartial in all business dealings.**

- We ensure that all potential suppliers and subcontractors have an equal opportunity to compete and do not accept or give kickbacks to subcontractors.

**We comply with competition, procurement, and antitrust laws.**

- We do not engage in price-fixing, dividing territories, agreeing to contract terms, or other similar activities with competitors that negatively impact the client and counter free-market principles

**We are aware that special rules apply when hiring current or former employees of governments or international organizations.**

- We discuss with Human Resources before we engage with potential candidates.
- We do not discuss potential employment with current government employees without first seeking approval from Human Resources.





## FAQ

### Why is a conflict of interest a problem?

Valiant expects that its employees will act, at all times, in the best interest of the company. A conflict of interest can compromise this expectation, as it puts the employee's professional duties and personal interests in conflict.

### Why do I need to disclose a conflict of interest?

All employees are required to disclose any conflict of interest situation to Valiant. This transparency allows Valiant to address any issues and work to mitigate the conflict.

### I received a small box of chocolates from one of the company's suppliers in celebration of Eid. Is this ok?

**In most cases, yes.** In general, employees may accept gifts and entertainment from non-government entities and individuals up to a limit of \$125 per calendar year from that entity and individual. The typical practice would be to share this within a team to avoid any perceived favoritism towards a particular supplier.

### Why may it be an issue for me to go to an expensive dinner with one of Valiant's suppliers?

The problem with expensive meals (and other extravagant entertainment) being paid for by a supplier is that this could influence, or be seen to influence, Valiant's actions towards the supplier and could be considered a bribe.

### Valiant won a new bid. Can I tell my spouse about this tonight?

**Maybe.** You cannot share nonpublic information with anyone outside of Valiant. If the bid's award has already been announced publicly (i.e., on the company's website), you can likely share. If it has only been announced internally, then this information cannot be shared outside of the company as it is considered confidential.

### In addition to my work for Valiant, I have a part-time consulting business. Is this ok?

Outside employment must be disclosed to evaluate if a conflict exists with work for Valiant. If approved, you must be mindful of keeping your work as a consultant separate, and not sharing any confidential or non-public information of Valiant.





## CORPORATE SOCIAL RESPONSIBILITY

**We are committed to being a good corporate citizen and making an ethical and responsible contribution to the countries and communities where we conduct business.**

- We are dedicated to conducting our business with integrity and satisfying the needs of our customers while also acting in an economically, socially, and environmentally sustainable manner.
- We believe that doing business without corrupt practices is possible, and we only work with companies that also conduct their business with integrity and high standards of business ethics.
- We consider the effect our work has on the environment and will strive to follow environmentally sustainable best practices to reduce our negative impact.
- Through collaboration with charitable organizations, we strive to make a unique and positive impact in the communities in which we operate.
- We respect the rights of all human beings and work to ensure that our supply chains are not subject to human trafficking, child labor, or other illegal or unethical labor conditions.



# WE ARE A COMPANY WITH INTEGRITY



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**As a company, we strive to provide all employees with the resources needed to meet their obligations under this Code and all applicable Valiant policies and laws.**

**We seek to prevent and detect criminal conduct and promote an organizational culture that encourages ethical conduct and expects compliance with the law. To this end, we have instituted an internal control system:**

- We provide each employee with a copy of this Code and all related policies.
- We provide ethics training for all new employees and refresher ethics training for all employees, including training on this Code, certain government contracting regulations, and other legal obligations.
- We have internal controls to facilitate the timely discovery and remedy of improper conduct, especially as it relates to obtaining and performing government contracts.
- We conduct audits to detect improper conduct, including engaging independent auditors to review our financial statements and accounting procedures and periodically evaluate the effectiveness of our ethics program.
- We have instituted a 24-hour Integrity Hotline that allows for anonymous reporting. Notices regarding the Integrity Hotline are posted in work areas.
- We have zero tolerance for any retaliation towards an individual who makes a good faith report of potentially unethical or unlawful conduct.
- We proactively investigate and address concerns reported by our employees and others and take corrective action where necessary.
- We conduct reviews of our policies, training, and internal control system to ensure they are up to date with the latest legal and ethical requirements.
- We fully cooperate with governmental investigations, audits, and reviews.
- We will timely disclose to the appropriate government officials any suspected misconduct by anyone employed with Valiant. We will disclose the results of any investigation conducted or corrective action measures taken.





## FAQ

**What should I do if I'm faced with a situation where acting with integrity conflicts with making a profit for Valiant?** You must always act with integrity. In the long run, acting with integrity is always the most profitable choice for the company. Acting in an unethical manner creates risks that could hurt Valiant's reputation and lead to prosecutions and fines. If you feel that you must choose between acting with integrity and making a profit for the company, please contact your manager or the Ethics and Compliance Department.

**What do I do if my manager tells me to do something unethical?** You must not do as your manager asks and report this immediately to Human Resources, Legal, or the Ethics and Compliance Department. All of our actions as Valiant employees must be lawful and in line with our Code of Conduct and policies. If your manager asks you to do something that conflicts with these, you must not do it.

**What if I'm not 100% sure something is wrong. Should I still raise my concern?** Yes. You will never get in trouble for reporting something that you believe is wrong. It is then the responsibility of Human Resources, Legal, or the Ethics and Compliance Department (as appropriate) to determine the facts of the situation. The principle to follow is "when in doubt, shout!"

**When should I raise an issue?** As soon as you become aware of a problem or a potential issue, especially as it relates to any impropriety related to a government contract, you need to report it to someone. This could be your manager, Human Resources, Legal, or the Ethics and Compliance Department. You can also report anonymously on the Integrity Hotline.

**What happens when I contact the Integrity Hotline?** When you contact the Integrity Hotline, you will be guided through a series of questions to provide information about your concern. You will also be given a username and asked to select a password so that you can contact the Hotline if you want to provide additional information about the situation or follow up on your report.

**I do not speak English very well. Can I still make a report?** Yes. You can speak to an operator on the Integrity Hotline in the language of your preference.

**How do I know you're looking into my concern?** You will receive confirmation that your report has been received and is being investigated. However, due to confidentiality, there is rarely additional information that can be provided regarding your report.

**What happens if someone makes a malicious report about me?** When a report is received, the Ethics and Compliance Department's task is to look into the concern to establish the facts.

**Can I report without giving my name?** Yes, through the Integrity Hotline you have the option to report a concern without giving your name. The Hotline is run by an external provider so you can have confidence in your anonymity. Through the Hotline, you can provide additional information throughout the investigation, and the Ethics and Compliance Department can message you without you revealing your name.

**Why can't I always know the outcome of an investigation?** Due to the confidential nature of investigations, often, the reporter cannot know the outcome. However, the reporter will be informed when the investigation has concluded.

**I want to report a concern, but I'm scared of what will happen to me. What should I do?** We recognize that it takes courage to report a concern, especially when you're worried about how others may view or treat you if they find out you reported. However, Valiant strives to have a "Speak Up" culture in which all employees can feel confident to raise their concerns. Therefore, the company treats each report with the utmost confidentiality and has zero tolerance for any retaliation, direct or indirect, against an individual who reports a concern in good faith.





## RECEIPT AND ACKNOWLEDGMENT

**I acknowledge that I have received a copy of the Valiant Code of Business Ethics & Conduct. I understand that:**

- I am responsible for reading and complying with the Code
- I am expected to act with integrity at all times
- I am personally responsible and accountable for my actions and should avoid any activity or behavior that may conflict with my duties under the Code
- I am required to report any violations or suspected violations of the Code to my manager, Human Resources, Legal, the Ethics and Compliance Department, or the Integrity Hotline
- I should direct any questions concerning the Code to my manager, Human Resources, Legal, the Ethics and Compliance Department, or the Integrity Hotline
- I will review the Code annually
- Violations of the Code may result in disciplinary action, up to and including termination

**X**

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Employee Signature

**X**

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Employee Name (please print)



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