



LS Technologies Code of Ethics

Integrity. Excellence. Commitment.

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Introduction

LS Technologies (LST) has established a positive reputation across our business, one that has been enhanced and safeguarded over the years by our culture of integrity, transparency, and ethical conduct. Our business is built on trust and our reputation. It influences many aspects of our company – the way our customers feel about our services and whether employees find LST a satisfying place to work. Therefore, it is important for all employees to protect our reputation through a strong culture of integrity, transparency, and ethics.

Our shared values of integrity, excellence and commitment are at the core of LST's Code of Ethics. Acting with integrity is about more than our company's image and reputation or avoiding legal issues; it is about sustaining a place where we are proud to work. It is about each of us knowing that we have done the right thing. This means acting honestly and treating each other, our customers, and partners with fairness, truthfulness, and dignity.

LST believes that everyone we interact with deserves nothing less than work that meets the highest standards of quality and excellence, performed in an environment where objectivity and integrity are in the forefront. This Code of Ethics is our guide to shape our workplace and define LST as a company deeply committed to ethical business conduct. This is not a comprehensive guide to all our policies and procedures or our responsibilities under the law; however, this code provides the basic principles and core values to ensure we all do the right thing.

It is up to each of us to adhere to the highest ethical and legal standards and to hold our colleagues to those standards. With your help, LST will continue to deserve the trust that we have earned in the past.

Employees should promptly report all issues or violations of this Code through the proper channels. We encourage notifying Ethics@lstechllc.com or 703-621-0705 to help resolve matters. Anonymous reports may also be submitted using the following form: <https://app.smartsheet.com/b/form/0303390421e545f2a46a8fd50648ecd9>

LST Mission Statement

Mission

LST's mission is to provide engineering, technical, business, and professional services for Federal Government agencies and commercial clients. We provide the highest quality services and we deliver best value solutions to support our clients' success. We are successful in accomplishing our mission due to our deep level of technical expertise, the integrity of our staff, our commitment to a sound work ethic and our passion for serving the public sector. We take pride in the work we perform which results in superior quality and service. This is directly reflected in our employees' level of professionalism and commitment to the mission. LST has a proven performance record supporting Federal Government clients since 2000.

Our Core Values:

Integrity	We maintain the highest moral standards. We are honest and ethical in everything we do. LST demonstrates we can be trusted to execute and meet our commitments.
Excellence	We are flexible and agile to meet our customers' dynamic needs. We create practical solutions that result in programs that can be implemented in a successful, efficient, and timely manner. We hire and develop highly skilled and experienced people who fit our corporate culture. We go above and beyond and actively pursue challenges.
Commitment	We take care of our employees, our clients, and our community. We place a strong emphasis on partnerships at every level of our internal organization, with our customers, and our project partners. We honor our promises and follow-through on our commitments.

What is the Code of Ethics?

LST's mission, values, and customer-focused behavior set the foundation for our Code. It provides further guidance about appropriate business behavior expected of all LST employees as we work and interact with fellow employees, customers, business partners, and competitors. Our Code is a statement of the fundamental principles that govern the conduct of our business. Ultimately, the success of our business is dependent on the trust and confidence we earn from our employees and those we do business with.

Our Code of Ethics applies to the Executive Team, all levels of Management, and every LST employee. It is essential to how we do business and reinforces the responsibilities we all share in protecting the Company's reputation.

The basic areas covered by this document are:

- **Respect in the Workplace**
- **Conflicts of Interest**
- **Financial Integrity**
- **Confidentiality and Communications with Third Parties**
- **Gifts, Gratuities, and Other Business Courtesies**
- **Company Image and Assets**
- **Compliance with Other Laws, Regulations and Standards**
- **Expectations and Responsibilities**

It is important that we understand our legal and ethical responsibilities so that we can make the correct, ethical decisions each time, every time.



Ask Questions...Speak Up!

This Code of Ethics is designed to serve as a broad outline of the legal and ethical principles adopted by LST. This Code and LST's Policies and Procedures must be used along with your common sense and good judgment.

As an LST employee, you are responsible for your own conduct. No one has the authority to make another person violate this Code. Any attempt to direct or otherwise influence another individual to commit a violation is in itself a violation of this Code.

Leads have a responsibility to create an open and supportive environment where employees feel comfortable raising questions and concerns. They should at all times model appropriate conduct and lead by example. If you are a Lead, you should always make sure that employees who report to you understand and follow this Code, as well as complete all required compliance and ethics training. Additionally, making opportunities to discuss and reinforce the importance of ethics and compliance with employees is imperative and helps to promote a greater understanding throughout the company.

We cannot live up to a commitment to act with integrity if we, as individuals, do not speak up when we should. Integrity is fundamental to LST. Everyone should feel comfortable to speak their mind, particularly with respect to ethics concerns. This 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 LST is doing—or may be about to do—something that violates the law or LST's policies.
- You have personally engaged in some type of misconduct.

Where to Go for Help

We all benefit greatly when employees exercise their power to prevent mistakes or misconduct by asking the right questions at the right times. If you are ever unsure as to what the best course of action is in a particular situation, or if you have a specific business conduct question, ask yourself:

- Is this consistent with the LST Code of Conduct?
- Is it ethical?
- Is it legal?
- Will it reflect well on me and the Company?
- Would I be comfortable if the matter was publicized in a newspaper?

If the answer to any of these questions is "No", then don't do it. If you are still uncertain, then you should always ask for guidance. You can seek help from your Lead, the Ethics and Compliance Officer, or LST's Human Resources (HR) Department.

Violations of the Code

If you suspect or know that a violation of the Code or a policy or procedure has occurred, contact your Lead or the Ethics and Compliance Officer immediately. Compliance with this Code is a condition of employment with LST. After a possible violation is brought to the Company's attention, we will investigate the matter confidentially. Those found to have violated this Code may be subject to disciplinary action, including but not limited to termination. Depending on the particular nature of the violation, we may be required to report the conduct to the appropriate authorities.

Zero Tolerance for Retaliation

LST values the help of employees who identify potential problems that need to be addressed. LST does not permit or tolerate retaliation of any kind against good faith reports or complaints of violations of this Code or other illegal or unethical conduct.

If you are aware that someone you work with raises a concern or provides information in an investigation, you should continue to treat the person with courtesy and respect. If you believe that someone has retaliated against you, please report the matter to the Ethics and Compliance Officer or LST's HR Department.

Making False Accusations

The Company will protect any employee who raises a concern honestly; however, it is a violation of this Code to knowingly make a false accusation, lie to investigators, or interfere or refuse to cooperate with an investigation. Honest reporting does not mean that you have to be right when you raise a concern; you just have to believe that the information you are providing is accurate.

Respect in the Workplace

LST is committed to fostering an inclusive workplace where talented people want to stay and develop their careers. Because good employee relations are at the heart of a company that is productive and effective, we encourage open-door communications at all levels. Below are some specific guidelines in regard to respect in the workplace.

Treat People with Dignity and Respect

Everyone deserves to work in an environment where they are treated with dignity and respect. LST values 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 relationships with appropriate behavior and integrity.

Wherever you work, you represent LST. Our workplace standards apply while working on our premises, at a Government installation, at offsite work locations where our business is being conducted, conferences, vendor fairs, at company-sponsored business and social events, or at any other place where you are a representative of LST. You should always act in a professional manner, including maintaining the following behavior:

- Always treat others with respect.
- Refrain from behavior that could compromise the integrity of LST.
- Strictly comply with LST's Drug-Free Workplace Policy.
- Never make disrespectful remarks about current or former customers, vendors, subcontractors, teammates, other employees, or about LST in general.

Conflicts of Interest

The term ***conflict of interest*** describes any circumstances that could cast doubt on an employee's or the company's ability to act with objectivity. Objectivity is of key importance to our customers. We must avoid any relationship or activity that might impair, or even *appear* to impair, our ability to make independent and fair decisions when performing our jobs. For every action we recommend, every acquisition we support or pursue, and every expenditure we incur, we must ensure it is the ethical thing to do. Our loyalty must be free from any conflicting interests.

Even if the conflict does not create an improper action, the appearance or perception of a conflict of interest can be equally damaging to our reputation. The following guidelines will help you recognize relationships and activities that represent a conflict of interest. Conflicts of interest can arise in many different contexts. They can occur in doing business with Government agencies, companies, or other organizations that employ our relatives; in performing work outside of your LST employment; or with respect to the financial holdings of you or your family members.

Organizational Conflicts of Interest (OCI)

Regulations that govern federal procurements prohibit or restrict our ability to compete or participate in a procurement if an organizational conflict of interest exists. These regulations exist to ensure that (1) Government contractors do not gain an unfair competitive advantage over competitors; and (2) other interests or work performed by a contractor do not cloud the contractor's objectivity in providing impartial advice to the Government.

An example of an organizational conflict of interest is where a company performed work under a contract which involved the development of requirements for another solicitation (e.g., specifications, statement of work, evaluation criteria). That company would then be precluded from bidding on the future procurement to provide the item or service for which the requirements were developed.

Organizational conflicts of interest are a complex subject. We take them very seriously and proceed with caution if even the appearance of a conflict could possibly exist. Conflicts can be handled in many ways. Sometimes disclosure to the Government is all that is necessary, but in other circumstances more actions may be required.

Personal Conflicts of Interest

As an LST employee, you are required to avoid conflicts of interest between your obligations to LST and your personal affairs. Any relationship or activity which could or would influence, or appear to influence, performance of your duties, must be disclosed to the Ethics and Compliance Officer immediately.

Financial Interests.

A conflict may exist if you, your spouse, or dependent children have a financial interest in an organization that is associated with the work LST is performing. For example, prior to working at LST, you were employed by Company X and you currently have financial holdings (e.g. stocks) in Company X. LST is working under a Government contract, including your support, to provide systems engineering work overseeing work performed by Company X. You must

disclose your financial holdings in Company X to the Ethics and Compliance Officer for evaluation via the Annual Ethics Certification Form.

Disclosure of Certain Relationships.

LST is obligated to disclose to the Government information regarding former Federal employees as well as LST employees who are related to a current FAA employee. These relationships include: father, mother, son, daughter, brother, sister, uncle, aunt, first cousin, nephew, niece, husband, wife, father-in-law, mother-in-law, son-in-law, daughter-in-law, brother-in-law, sister-in-law, stepfather, stepmother, stepson, stepdaughter, stepbrother, stepsister, half-brother, half-sister, spouse of an in-law, or a member of his/her household. You must disclose any of the above relationships to the Ethics and Compliance Officer for evaluation via the Annual Ethics Certification Form.

Other Personal Relationships.

You may find yourself in a situation where your spouse, children, parents, or someone else that you have a close relationship with is a supplier/subcontractor/vendor, customer, or competitor of LST. Such situations are not necessarily prohibited, but they call for extra sensitivity to security, confidentiality, and conflicts of interest. Bring these types of relationships to the attention of the Ethics and Compliance Officer so that they can be properly evaluated.

Outside Employment

Employees may not engage in employment other than with LST, either for pay or as a donation of their personal time, without the prior written approval of the Ethics and Compliance Officer. This includes self-employment. Employees must disclose the nature of any outside employment (including self-employment) on an annual basis to the Ethics and Compliance Officer via Appendix B to the Annual Ethics Certification Form so that it may be evaluated for any potential conflicts.

Corporate Obligations

We owe a duty to LST to advance its legitimate interests when the opportunity to do so arises. You may not take for personal gain, nor publish, present, or release to non-LST employees or external organizations without appropriate permissions any opportunities, ideas or information that: (1) are discovered or developed through the use of LST property, information, or that are related to the business of LST; or (2) are developed on company time.

Political Contributions, Activities and Lobbying

LST respects your right to support the political activities of your choice; however, participation must be on your own time, at your own expense, and using your own resources. Employees may not make political contributions or expenditures on behalf of LST and must refrain from conducting personal political activities in a manner that might suggest sponsorship or approval by LST, including the use of the employee's LST title or LST's name.

Any personal letters that you write to public or political officials must be written on personal stationery, must be composed and produced on your personal time, and must not draw on corporate staff or resources.

Financial Integrity

Accurate Billing, Pricing and Record-Keeping

We must ensure the accuracy of all LST business and financial records, which is everyone's responsibility, not just the role of the Accounting and Finance Department personnel. Accurate recordkeeping and reporting reflect on LST's reputation and credibility. It also ensures that LST meets its legal and regulatory obligations. As a contractor to the Federal Government, we understand the importance of financial disclosure and accountability. We comply with all financial reporting and accounting regulations. The following principles should help guide you when using LST funds or recording LST transactions:

- Be cost-conscious when acquiring materials and services. We must strive to make purchases that are the best value to our clients. In certain situations, we should obtain three quotes from vendors in order to determine that our selection is in fact the best value.
- Make certain that bills are accurate, prompt, and complete.
- Whenever you are responsible for incurring an expense on behalf of LST or the Government, be sure it is supported by appropriate documentation that describes its purpose.
- Never make or approve a payment on LST'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 accuracy of all cost charges and records. Falsifying records is a serious offense that can result in criminal and financial penalties for LST and the people involved. This includes timekeeping.
- 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 are truthful and accurate.
- Never use LST funds or assets for any unlawful or improper purpose, including personal use.

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. A kickback or bribe may be defined as "any money, fee, commission, credit, gift, gratuity, thing of value or compensation of any kind that is provided, directly or indirectly, and that has, as one of its purposes, the improper obtaining or rewarding of favorable treatment in a business transaction," essentially negotiated bribery. LST employees are prohibited from receiving, offering, promising, authorizing, directing, or making any bribes, kickbacks, or payments of money or anything of value to improperly obtain business or any other advantage for LST or themselves.

In the performance of our daily duties, we come across or are entrusted with certain types of information. How we deal with the information we receive while working at LST is governed by specific legal and ethical standards. We have an obligation to familiarize ourselves with the rules governing the use of information. When in doubt, stop and ask questions.

Confidentiality and Communications with Third Parties

Non-Public Information about LST

As an employee of LST, you may be exposed to a wide range of non-public information about the company, such as its customers, strategies for the future, financial information, internal business practices, and more. Disclosing this information could undermine LST's strength, so you must hold this information confidential. Whenever you receive an inquiry that would require you to disclose non-public information about LST, refer it to your Lead or contact the Ethics and Compliance Officer for guidance. LST employees have a duty to maintain confidentiality even after departure from the company.

Information Received from a Non-Government Third Party

In the regular course of doing business, we often receive confidential information from non-government third parties, such as commercial customers, subcontractors, and suppliers. We are bound by the confidentiality provisions in our contracts and Non-Disclosure Agreements with those third parties. Until you learn otherwise, you should assume that all information received from a third party is confidential and not disclose it to anyone who does not have a need to know within the company.

If information received from another company is marked "company-confidential" or has a similar, restrictive marking, you must comply with those markings. Revealing information provided in confidence and for a specific purpose jeopardizes our ability to work closely with other companies, and that jeopardizes our success.

Government Information

LST's government customers and government subcontractors 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. In the event you have access to government information, make sure that you are aware of all appropriate handling requirements. Violations could lead to disciplinary action up to and including termination.

Licensed Material

LST does not condone the illegal duplication of licensed materials. Using, copying, or disclosing software and other materials that are owned by third parties and licensed to LST 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.

What Is Nonpublic Information?

Any information not disclosed or made generally available to the public. Examples include information related to:

- Employees
- Contracts
- Strategic and business plans
- Major management changes
- Mergers and acquisitions
- Technical specifications
- Pricing and acquisition plans
- Proposals
- Financial data

Investigations

LST employees may be directly contacted for interviews by government representatives or agents, including representatives of the Federal Bureau of Investigation, agency Inspectors General, the Defense Contract Audit Agency, or other government investigation services conducting civil or criminal investigations. LST's policy is that we will fully cooperate with any government investigation and answer all inquiries truthfully. As an employee of LST, you must promptly advise the Ethics and Compliance Officer of any contacts with the Government regarding an investigation.

Communications with Media

It is our policy to provide accurate and consistent communication to the public. To maintain the consistency and accuracy of the information and to ensure that we speak with one voice, corporate spokespeople are designated to respond to all inquiries. Only those spokespeople are authorized to release information to the public. Unless you have been designated as a spokesperson, you must **not** respond to inquiries from the press. All inquiries from the media should be forwarded immediately to the Vice President of Corporate Services, Rachel Wardley.

Gifts, Gratuities, and Other Business Courtesies

LST selects suppliers and win awards on the basis of the merits of our services. We should avoid any actions that create the perception that favorable treatment of outside entities by LST was sought, received, or given in exchange for personal business courtesies. To avoid even the appearance of impropriety, there are restrictions on the types of business courtesies you may receive from other firms or offer to other firms, agencies, and persons with whom we do business.

The term “business courtesies” covers gifts, loans, services, meals, entertainment, unusual hospitality, or other things of value.

You should not accept gifts, meals, entertainment, or any other favor, from customers or suppliers if doing so might compromise, or appear to compromise, your ability to make objective business decisions in the best interest of LST. When in doubt, as a general rule, say no if a person, group, or corporation offers you anything of monetary value, such as a rebate, present, cash, gratuity, or favor, that could influence a matter in which LST has an interest, or which could affect actions by you, LST, or an LST customer. 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.

Some helpful guidelines are:

- Do not accept gifts, meals, or entertainment in exchange for doing, or promising to do, anything for a customer or supplier.
- Do not ask for gifts from a customer or supplier.
- Do not accept gifts of cash or cash equivalent, such as gift cards.
- Do not accept gifts of more than modest value. We define modest value as a gift (other than cash) valued at or below \$20 per occasion, as long as the total amount of gifts that the employee accepts from that particular source does not exceed \$50 for the year.
- Examples of acceptable gifts include a logo pen or water bottle, or a small gift basket at holiday time.
- Gifts of symbolic value, such as trophies and statues that are inscribed in recognition of a business relationship, may be accepted.

Company Image and Assets

Company Image

LST's reputation and identity are among our most valuable assets. It is critical that we conduct ourselves in a manner that reflects positively on the company's image and identity. Never disparage or misrepresent LST.

Be careful that the activities you become involved in and the things you say as an individual are not confused with LST policies or positions. You can avoid the appearance of a connection between LST and your personal outside activities by:

- Not using LST's name, influence, funds, or other assets in your outside activities.
- Not supplying the media with interviews or other information about LST.
- Stating clearly that views expressed in any article, book, or other document for publication that is not an LST document are yours alone.
- Obtaining prior approval from the VP of Corporate Services, Rachel Wardley, for any information published on LST's behalf or with its endorsement.

Company Assets

It is imperative that LST's assets are protected and used in the manner they were intended. LST assets include its facilities, computers, inventory, trade secrets and other intellectual property, office supplies, equipment, products, confidential information, and funds. All employees are responsible for using good judgment and common sense to ensure that these assets are not misused, misappropriated, or wasted.

Theft, carelessness, and waste have a direct impact on our credibility and ability to serve our customers. In addition, any misuse or misappropriation such as unauthorized removal of a product, equipment or information, embezzlement, or intentional misreporting of time or expense may be considered criminal and can have serious consequences.

Examples of Company Assets

- Company money or products
- Employees' time at work and work products
- Computer systems and software
- Telephones
- Photocopiers
- Proprietary information
- Company trademarks
- Tools

Use of Information Systems

Information systems—the hardware, software, and data that are stored, processed, transmitted, and reported—are critical to business success. Examples include your desktop or laptop computer, telephones, file servers and network, e-mail messages, and desktop applications used in the conduct of LST business. You must use these systems responsibly and for legitimate business purposes. You may not use LST information systems for the purposes of:

- Engaging in communications that might be considered illegal, offensive, slanderous, harassing, obscene, vulgar, or otherwise disruptive to normal business activity.

- Visiting inappropriate internet sites.
- Improperly disseminating copyrighted or licensed materials or confidential and proprietary information.

You are also expected to protect the security and confidentiality of LST and Government information systems. You must protect:

- Information used to access company information systems, including user IDs, passwords, and building-access key card.
- Company data and information.
- Information systems from damage, including physical damage and virus-caused damage. No corporate provided security mechanisms shall be bypassed.

Any communications you have at work or using LST resources (computers, e-mail, voicemail, 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 LST policies are being followed.

Comply with Laws and Regulations

We must each operate within the bounds of all laws, regulations, and internal policies applicable to LST's business, wherever we conduct it. Where local laws are less restrictive than this Code, you must comply with this Code, even if your conduct would otherwise be legal. On the other hand, if local laws are more restrictive than this Code, you must always, at a minimum, comply with those laws.