

At C5MI Insight, LLC (“C5MI” or the “Company”), our purpose is to unleash business potential by converging people, process, and technology to reduce waste, drive productivity, improve lives, and ensure sustainability. We are committed to conducting business in strict compliance with all applicable laws, rules, and regulations and with high standards of ethics and honesty. It is important to note the C5MI Core Values that are the foundation of this Code of Business Ethics and Conduct:

Challenge! We believe in challenging the present - it's the only way to shape the future. We must be exceptional communicators and collaborators while always learning. We also understand that speaking your mind requires equal parts brain (what to say), thoughtfulness (when to say it), and caring (how it's said). Incremental won't win.

Have Fun! We are on a journey together. Take care of each other. Life isn't all about work. Live your happiness. Be healthy.

All In! You can't fake passion – show your energy. Own it – it is a shared responsibility. Our team is made up of top quartile talent and we never accept second best and we remain focused on creating an environment to realize the team's true potential.

Never Screw the Customer! We have walked a mile in your shoes. Experience matters. Be true – no BS. Delighted Customer > Team > Individual. Bend don't break; partnerships are crucial, and we choose partners, not just clients.

GSD! We take the initiative. Winners don't make excuses. We act with urgency. We are aligned to the process, always improving and audit ready. We take accountability, relentlessly execute, and swarm challenges while planning for tomorrow. That is how we win!

Environmental Sustainability Stewardship! Evangelists and practitioners of efficiency, who lead awareness and adoption of environmental and sustainability best practices by merging people, process, and technology.

At C5MI, we are a community built upon these Core Values which guide our every action. In furtherance of this important policy, which applies to everyone who acts on behalf of C5MI, including employees, executive officers, directors, consultants, contractors, part-time workers, and interns, C5MI hereby adopts this Code of Business Ethics and Conduct, and is committed to the principles and policies established herein.

1. Ethical Workplace Conduct

1-1. Workplace Conduct

C5MI endeavors to maintain a positive work environment. Each individual plays a role in fostering this environment. Accordingly, we all must abide by certain rules of conduct, based on honesty, common sense, and fair play. If you're a W-2 employee, please see the Employee Handbook for additional information regarding workplace conduct that is not set forth herein.

1-2. Equal Employment Opportunity and Non-Harassment

It is C5MI's policy to prohibit intentional and unintentional discrimination or harassment of any individual by another person on the basis of any protected classification including, but not limited to, race, color, national origin, disability, religion, marital status, veteran status, sexual orientation, gender identity, or age. The purpose of this policy is to ensure that in the workplace, no one discriminates or harasses another individual. If anyone feels that he or she has been subjected to conduct which violates this policy, he or she should immediately report the matter as set forth in Section 5 of this Code or the Employee Handbook.

1-3. Drug-Free Workplace Act Compliance

C5MI complies with the Drug Free Workplace Act of 1988. We expect you to report to work free of the influence of alcohol, illegal substances, and any legally prescribed medications that may alter your ability to perform your work safely. This policy applies to all employees and other individuals (including contractors) who perform work for the Company. W-2 employees should refer to the Employee Handbook for additional information regarding our Drug-Free Workplace and Alcohol Consumption Policy.

1-4. Relationship with the Environment and Community

We are committed to conducting our business in compliance with all environmental and labor health and safety laws and regulations. We make efforts to provide a safe and healthy work environment for performing work for C5MI and to avoid adverse impacts and damages to the environment and the communities where we conduct our business. Achieving this goal is under the responsibility of all executives, directors, and employees/contractors.

We are also committed to building relationships with the communities where we work. Wherever the company works, we make efforts to give positive contributions to the surrounding community and we strongly encourage our employees to perform a positive role in the community.

2. Compliance With Laws

2-1. Trafficking in Persons

C5MI believes that all individuals should be treated with dignity and respect. By fostering an environment that supports all aspects and dimensions of human rights, we can maintain our commitment to integrity and our core values promote more satisfied and productive employees and enhance the competitiveness of our businesses. We will not tolerate, nor do business with, any individual or company that uses child or forced labor or traffics in persons. We expect anyone acting on behalf of C5MI to report any employee, supplier, contractor, or other business partners who participate in these acts. If you suspect that anyone that does business for us or with us participates in this behavior, report it using any of the methods listed in this Code.

C5MI strictly prohibits all forms of trafficking and will take all necessary steps to ensure that trafficking does not occur in its business activities. The Company's employees, managers, officers, and other business partners must adhere to all Company policies and recruitment standards to combat trafficking in persons and trafficking-related activities. Human trafficking and related activities include harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery. The United States government's policy prohibiting trafficking in persons is outlined in FAR 52.222-50. If you believe FAR 52.222-50 has been violated, you should report such information immediately to the Lindsay Creighton, the Chief Compliance Officer.

2-2. Prevention and Fight Against Money Laundering

We are committed to preserving our reputation in the community, helping in efforts to fight against money laundering and the financing of terrorism. Money laundering is the practice of disguising property or sources of resources obtained illegally by means of a series of transactions to "clean" the funds to make it appear as though they were coming from legal activities.

We assure that our facilities and services are not used to facilitate money laundering or terrorist activities and we repudiate any practice of fraud, illegality, and corrupt actions, including transactional. If anyone has any concerns about our process or internal procedures to fight against money laundering, they can contact the Chief Compliance Officer or use the confidential reporting hotline outlined in this Code.

2-3. Anti-Corruption

C5MI has zero tolerance for corruption. If you are employed by, contracted with, and/or doing business with the Company, you must not offer, pay, promise, or authorize bribes, kickbacks, or other payments of value to any official of any country, state, local, or tribal government. This includes:

- Influencing any act or decision of such government official, in his official capacity
- Inducing such government official to use his or her influence to assist in obtaining, retaining, or directing Company business.

We expect you to comply with the U.S Foreign Corrupt Practices Act (FCPA) as well as the anti-corruption laws that govern our operations both nationally and internationally.

2-4. Anti-Trust/Fair Competition

C5MI believes that competition, whether for government or commercial work, must be fair and honest. To that end, the Company's officers, directors, and employees will refrain from gathering competitor intelligence by illegitimate means and refrain from acting on knowledge that has been gathered in such a manner. In addition, C5MI's owners, officers, directors, and employees/contractors shall seek to avoid exaggerating or disparaging comparisons of the services and competence of their competitors.

C5MI does not knowingly enter into business arrangements that may improperly eliminate competition, restrain trade or that are anti-competitive. This may include, for the purpose of restricting competition:

- Engaging in any consultation, communication or agreement with another competitor relating to prices to be offered by the Company.
- Disclosing the Company's intention to submit an offer on a particular procurement.
- Disclosing, directly or indirectly, to other vendors or competitors the prices that we plan to propose, or the methods or factors used to calculate such prices.
- Boycotting supplier or customers.
- Disparaging, misrepresenting, or harassing a competitor.

C5MI does not engage or participate in insider trading. The Company's employees/contractors are responsible for identifying and avoiding potentially anti-competitive arrangements and notifying the legal department with any questions or concerns. The Company prohibits any of our employees from participating in illegal insider trading, which may include but not be limited to, buying or selling stock or securities of any third-party entity, company, or partner based on non-public information obtained during employment. If you suspect anyone that does business for us or with us participates in this behavior, report it using any of the methods listed in this Code.

2-5. Export and Import Laws

Anyone performing work for C5MI is expected to fully comply with applicable U.S. regulations related to both import and export compliance. Employees/contractors must comply with all export and import laws and regulations that govern the transfer between countries and/or foreign nationals even in the United States, of certain technical data, equipment, and technology. C5MI may deal with goods and/or services that are subject to export/import restrictions. These restrictions may include certain technical data, equipment and/or technology that may have military or state security applications. Any employee/contractor of the Company that deals with controlled goods and/or services must abide by Company policies and procedures that are designed to ensure compliance with these laws and regulations.

2-6. False Claims

Federal legislation prohibits contractors from obtaining payments from the federal government through the submission of false claims or statements. C5MI strictly prohibits all owners, officers, directors, employees, and agents (including contractors) from making false claims or statements to the government. All of the Company's certifications, invoices, progress payment requests, and other payment-related statements made to the government shall be verified as true, accurate, and complete prior to submission.

2-7. Prohibition on the Use of and Contracting for Certain Telecommunications and Video Surveillance Equipment

In accordance with FAR 52.203-13, C5MI shall timely disclose, in writing, to an agency's Office of Inspector General, with a copy to the Contracting Officer, whenever, in connection with an award, performance, or closeout of a contract or any subcontract thereunder, the Company has credible evidence that a principal, employee, agent, or subcontractor has committed (1) a violation of federal criminal law involving fraud, conflict of interest, bribery, or gratuity violations found in Title 18 of the United States Code, or (2) a violation of the civil False Claims Act, 31 U.S.C. §§ 3729-3733.

Federal legislation prohibits the Government from contracting with businesses that use certain telecommunications or video surveillance products or services, or that use equipment or services that, in turn, use components/subcomponents, manufactured or provided by specific Chinese companies, anywhere in their businesses, regardless of whether such use is related to a Government contract. The prohibited products or services are those related to telecommunications products manufactured by Huawei Technologies Company or ZTE Corporation (or any of these companies' subsidiaries or affiliates), and video surveillance products and telecommunications products manufactured by Hytera

Communications Corporation, Hangzhou Hikvision Digital Technology Company, or Dahua Technology Company (or any of these companies' subsidiaries or affiliates) (collectively, the "Prohibited Equipment").

In accordance with FAR 52.204-24 and FAR 52.204-25, C5MI must certify that the prohibited products and telecommunications are not being used or delivered on any federal contracts. As such, C5MI will inquire into the equipment of every employee/contractor used in the course and scope of their work. Any employee/contractor of C5MI that discovers that they are using Prohibited Equipment must immediately notify the Angela Fredericks, the Compliance Officer, so that the Company can take prompt remedial action in compliance with the laws and regulations. Further, should anyone have any questions regarding the scope of the Prohibited Equipment and any questions specific to their equipment use, they must immediately contact Lindsay Creighton, Chief Compliance Officer, and/or their supervisor.

2-8. Accurate Timekeeping and Costs

Accurately charging labor, material, and other costs is essential to maintaining the integrity of customer billings, financial reporting, and planning. Deliberate mischarging of work time or timecard fraud violates Company policy and the law. Knowingly charging an unauthorized account or cost objective, or knowingly approving such mischarging, or shifting of costs to an improper account, is prohibited. Each employee/contractor is responsible for ensuring that labor, travel, material, and other expenses are recorded truthfully. These costs include, but are not limited to, normal contract work, work related to independent research and development, and bid and proposal activities. Supervisors or managers should be contacted if an employee or contractor has questions or concerns about proper charging of labor and other costs. Each employee/contractor should maintain control over their time entries, time entries must be made daily, and changes may only be made by the employee/contractor with the approval of a supervisor. Supervisors or designated individuals will approve time entries on a weekly basis. Transactions between the Company and outside individuals and organizations must be promptly and accurately entered in our books in accordance with generally accepted accounting practices and principles in the United States and in any other country in which we may do business. Under no circumstances should you misrepresent facts or falsify records. Please see the Timekeeping Policy for additional information and details regarding timekeeping guidelines and requirements.

2-9. Uncompensated Overtime

C5MI pays its exempt employees a fixed salary for all hours worked. They are not entitled to additional compensation for hours worked over forty (40) in a workweek. While rare, should an employee billing time to a time and materials contract work over 40 hours in a

workweek, the cost allocated in the bill rate for labor will be adjusted to account for the additional hours worked.

2-10. Procurement Integrity Act and Respect for Third Party Information

C5MI competes fairly in the marketplace, strictly adheres to the Procurement Integrity Act, and respects proprietary information belonging to third parties, such as competitors, customers, and suppliers. The Company prohibits any employee or contractor, unless authorized by the owner of such information, to seek or gain access to proprietary information belonging to third parties or allow such information to be provided to them inappropriately. Any exposure to any potentially non-public competitive information, to which an employee/contractor does not have rightful access, must be reported in accordance with Section 5. If any other employee, subcontractor, potential subcontractor, government employee, or person offers access to this type of information with the knowledge or suspicion that you are not authorized to have access, you must report such activity in accordance with Section 5. Do not forward or otherwise share any such questionable information. C5MI's management team will work with you to resolve any questions about rightful access to the information, provide instructions on handling the information, and take appropriate steps to notify the required government personnel and rightful owner of the information.

Among other things, you shall not:

- Solicit or obtain information relating to a government procurement that is “source selection information,” i.e., planning or evaluation information related to an acquisition that has not been released publicly by the agency. Examples of such information include, but are not limited to, proposed costs or prices, source selection plans, technical evaluation plans, competitive range determinations, ranking of bids, proposals or competitors, evaluation reports or other information marked as “source selection information” or otherwise restrictively marked.
- Solicit or obtain third party “contractor bid or proposal information,” i.e., information submitted in connection with a bid or proposal that previously has not been made available to the public or disclosed publicly. Examples of such information include, but are not limited to, cost or pricing data, indirect costs and direct labor rates, other proprietary information about manufacturing processes, operations and/or other information marked as “contractor bid or proposal information” or otherwise restrictively or confidentially marked.
- Solicit share or use third-party proprietary information that may have been provided inappropriately to the employee/contractor or provided to the employee/contractor

for unrelated purposes. Such information includes, but is not limited to, proprietary information belonging to a former employer, proprietary information shared for unrelated teaming or subcontracting purposes, proprietary information shared under an unrelated nondisclosure agreement, and/or proprietary, sensitive, or confidential information obtained in the course of performing an unrelated government contract or subcontract.

- Solicit share or use third-party proprietary information that may have been provided inadvertently to an employee/contractor or others. Such information may include emails from government officials or other third parties containing information or attachments that the employee/contractor recognizes as containing third-party proprietary information or other confidential information that was shared inadvertently by the sender.

With respect to all federal government contracts, subcontracts, and related transactions, C5MI and anyone who performs work on behalf of C5MI must strictly avoid any conduct that may violate the integrity of the federal procurement process. C5MI and its employees/contractors may not, directly or indirectly:

- Offer, give, or promise to any government official any money, gratuity, gift, bribe, kickback, or other thing of value.
- Solicit or obtain, prior to contract award, any proprietary or source selection information from any government official.
- Disclose proprietary or source selection information to any person outside of the Company other than an individual authorized by the contracting officer to receive such information.
- Engage in employment discussions with a procurement official, or make an offer or promise of future employment, or a future business opportunity, to a procurement official.
- Make inaccurate representations with respect to size, status, affiliation, or cost or pricing information.

2-11. Gifts, Gratuities, and Business Courtesies

C5MI often works with the U.S. Government, and we must respect the special laws surrounding contracting with the U.S. Government. With few exceptions, U.S. Government agencies have strict prohibitions against their employees accepting any business courtesies (FAR 52.203-3). Therefore, except as otherwise permitted by law or regulation, C5MI employees/contractors are prohibited from offering or providing any business courtesy, including meals, entertainment, travel, lodging expenses, or other thing of value to any U.S. Government employee or representative. Modest refreshments—

such as soft drinks, tea, coffee, and fruit offered on an occasional basis in conjunction with business activities—are acceptable. When dealing with representatives of a particular federal agency, employees/contractors are responsible for complying with that agency's standards of conduct. Where there is a question as to a particular agency's requirements under its standards of conduct, employees/contractors must contact the Compliance Officer in advance for guidance. Similarly, those who deal with U.S. state or local government officials are responsible for knowing and adhering to the rules that may apply to such state or local government employees. Generally, such officials are often under prohibitions similar to those of U.S. Federal Government employees.

C5MI employees/contractors may provide meals, refreshments, or entertainment of reasonable value to non-government persons in support of business activities, provided the business courtesy is not offered as a "quid pro quo," (offered for something in return for the courtesy), or the courtesy does not violate any law, regulation, or the standards of conduct of the recipient's organization. Any employee/contractor must inquire about prohibitions or limitations of the recipient's organization before offering any business courtesy. The courtesy must be consistent with marketplace practices, infrequent in nature, and not lavish or extravagant. It cannot cause embarrassment or reflect negatively on our reputation if it were to become known.

3. Confidential and Proprietary Information

3-1. Confidential Company Information

During the course of work, an employee/contractor may become aware of confidential information about C5MI's business, including but not limited to information regarding Company finances, pricing, products, and new product development, software and computer programs, marketing strategies, suppliers, and customers and potential customers. An employee/contractor may also become aware of similar confidential information belonging to the Company's clients. It is extremely important that all such information remain confidential, and particularly not be disclosed to our competitors. Any employee/contractor who improperly copies, removes (whether physically or electronically), uses, or discloses confidential information to anyone outside of the Company may be subject to disciplinary action up to and including termination. Employees/contractors may be required to sign an agreement reiterating these obligations.

3-2. Protecting Classified Information

In the normal course of C5MI's business with government customers, employees/contractors may be required to hold a government security clearance, and you may have access to information that is classified or facilities that are restricted. We expect

employees/contractors to comply with both the letter and the spirit of the laws, rules and regulations that apply to classified information and/or restricted facilities. Additionally, employees/contractors should conduct themselves in a manner fully consistent with all requirements of the security clearance they hold. This includes avoiding professional or personal conduct that could be determined to harm your ability to obtain or maintain such a clearance.

Whether a security clearance is held or not, an employee/contractor must not seek access to classified information or restricted facilities unless that access is required to carry out their assigned tasks. Employees/contractors must not accept access to, retain, or otherwise deal with classified information without the appropriate security clearance level. Employees/contractors may not enter restricted facilities unless they hold a current and valid security clearance that entitles the appropriate degree of access. If there is any doubt about whether the restrictions that may apply to information or facilities or whether your security clearance is appropriate to the circumstances, you must consult with your manager.

3-3. Technology Restrictions

Pursuant to the No TikTok on Government Devices Act, employees/contractors working on federal contracts are required to delete the application TikTok or any successor applications developed by ByteDance Limited from their personal devices that are used in connection with work performed on a federal contract; this includes, but is not limited to, cell Phones, tablets, and personal computers. Additionally, employees/contractors will not be allowed to access TikTok on those devices through the use of an internet browser. Upon employment or transfer to a project performing work on a federal contract, employees/contractors will be required to sign the enclosed Certification before performing any work on the federal contract. Additionally, employees/contractors are responsible for reporting the violation or suspected violation of this policy to the Chief Compliance Officer.

Additionally, federal legislation prohibits the Government from contracting with businesses that use certain telecommunications or video surveillance products or services, or that use equipment or services that, in turn, use components/subcomponents, manufactured or provided by specific Chinese companies, anywhere in their businesses, regardless of whether such use is related to a government contract. The prohibited products or services are those related to telecommunications products manufactured by Huawei Technologies Company or ZTE Corporation (or any of these companies' subsidiaries or affiliates), and video surveillance products and telecommunications products manufactured by Hytera Communications Corporation, Hangzhou Hikvision Digital Technology Company, or Dahua Technology Company (or any of these companies' subsidiaries or affiliates) (collectively, the "Prohibited Equipment").

In turn, C5MI will inquire into every employee's/contractor's equipment used in the course and the scope of their work. Any employee/contractor of C5MI that discovers that they are using Prohibited Equipment must immediately notify their supervisor so that the Company can take prompt remedial action in compliance with the laws and regulations. Upon employment or transfer to a project performing work on a federal contract, employees/contractors will be required to sign the enclosed Certification. Further, should employees/contractors have any questions regarding the scope of the Prohibited Equipment and any questions specific to his/her equipment use, they must immediately contact the Chief Compliance Officer and/or their supervisor.

4. Conflicts of Interest

4-1. Conflict of Interest and Business Ethics

It is C5MI's policy that all employees/contractors avoid any conflict between their personal interests and those of the Company. The purpose of this policy is to ensure that the Company's honesty and integrity, and therefore its reputation, are not compromised. The fundamental principle guiding this policy is that no employee/contractors should have, or appear to have, personal interests or relationships that actually or potentially conflict with the best interests of the Company.

C5MI strives to encourage and promote objectivity in business decision-making that is free of conflicts of interest. Avoiding conflicts of interest is critical to maintaining integrity and honesty in the way the Company conducts its business. C5MI employees/contractors have a duty of loyalty to the Company and must also avoid any situation that may involve a conflict or the appearance of a conflict of their personal interests and the interests of the Company. In dealings with current or potential business partners including customers, suppliers, contractors, or competitors, as well as with co-workers, employees/contractors must act in the best interests of the Company to the exclusion of personal advantage. To this end, C5MI employees/contractors are expected to make business decisions with the Company's best interests in mind and to exercise business judgment independent of external influences such as personal financial interests, external business relationships, outside employment, and familial relationships.

Employees/contractors must promptly disclose to their supervisor and the contacts referenced in this Code any situation which may involve a conflict of interest, including the types of conflicts more fully described below.

- Financial Interest in a Business Partner. A conflict may arise when an employee/contractor, or a family member, owns a financial interest in any outside enterprise which does business with or seeks to do business with the Company.

For purposes of this paragraph, “financial interest” is an ownership interest of greater than 1% in the entity at issue.

- Outside Directorship or Key Roles. A conflict may arise by serving as a director, officer, partner, consultant/contractor, and employee or in any other key role in any outside enterprise which does business with or seeks to do business with the Company. Outside employment with organizations that have no business dealings with the Company is not deemed a conflict of interest nor is serving on boards of not-for-profit organizations and related community organizations so long as the time commitment of such service does not interfere with the employee's/contractor's work duties.
- Corporate Opportunities. Acting as a broker, finder or another intermediary for the benefit of a third party in transactions involving the Company or its interests is a conflict. C5MI prohibits employees/contractors from using Company property, information, or resources for personal gain, for the benefit of third-party, or to compete against the Company.
- Association with a Competitor. A conflict may arise by having any connection with or acting in any capacity similar to those capacities described above for any business or other entity that would be considered a "competitor" of the Company.
- Non-Fraternization, Nepotism, and Family Members. A conflict may arise from other arrangements or circumstances, including family or other personal relationships, which might dissuade the employee/contractor from acting in the best interest of the Company. Although C5MI permits the employment of relatives, such family members cannot be supervised or managed by another family member.

4-2. Organizational Conflicts of Interest

C5MI understands that certain circumstances may arise that could be potential conflicts and is viewed as affording our company an unfair competitive advantage in government procurement or call our impartiality into question. It is referred to as an organizational conflict of interest or an “OCI.” OCIs may arise through, but are not limited to, situations that involve the possibility of:

- Biased Ground Rules. This may occur if C5MI, an affiliate, or a subcontractor as part of a performance of one government contract, has set ground rules for the competition for another government contract (such as writing or contributing to the statement of work or specifications for the second contract). In such situations, the

concern is that C5MI, an affiliate, or a subcontractor could skew the competition, whether intentionally or not, in favor of its own organization.

- Impaired Objectivity. This may occur to the extent that conflicting roles under different contracts raises questions about our ability to render impartial advice (such as the evaluation of an affiliate, team member, competitor, or our own work, or if we make recommendations relating to our own products). In such situations, the concern is that the ability to render impartial advice to the government will be undermined by a relationship to the entity, product or service being evaluated.
- Unequal Access to Information. This may occur if we have access to competitively useful non-public information as part of our performance of a government contract, and that information could provide a competitive advantage to our organization in a later competition. The access can be through C5MI, an affiliate, a subcontractor, or a recently hired employee.

Potential OCIs must be identified as early in the procurement process as possible.

4-3. Political Contributions and Lobbying Activities

C5MI encourages its employees/contractors to become involved in civic affairs, including political matters. However, employees'/contractors' political activities, including, but not limited to, campaign contributions, must be on an individual basis, on the employee's/contractor's own time, and at the their own expense. When an employee/contractor speaks on political issues, they must make it clear that the comments are made on their own behalf, and not as a representative of C5MI.

4-4. Recruiting and Employing Current or Former Government Personnel

The laws and regulations concerning hiring present and former federal government employees are complex. Among other things, the rules (1) prohibit contractors from making offers to or discussing post-government employment or business opportunities with government procurement officials participating in a solicitation on which a company is bidding or offering; (2) prohibit government officials from participating in a government matter involving any firm with which the official is negotiating or has an arrangement concerning future employment; and (3) prohibit certain post-government employment activities, including representation of a contractor before the government on a matter in which the employee/contractor participated personally and substantially while a government employee.

If you want to interview, negotiate with, or make any offer to a present or former government employee, you must first discuss the matter with the Chief Compliance Officer (CCO) and the applicable c-suite executive of the department, providing all of the pertinent details. Only after you receive approval from both may you begin any discussions or negotiations, and only within the limits established.

5. Compliance with this Code

5-1. Employee Responsibilities

As an employee/contractor, you are expected to comply with this Code and all policies and procedures of the Company, as well as to actively promote and support C5MI's values. You should always take the necessary steps to prevent a violation of this Code. You should immediately report situations of non-compliance to your manager or via one of the avenues listed in this Code.

5-2. Management responsibilities

If you are a manager, officer, or supervisor with the Company, you have additional duties concerning this Code. You are expected to be a role model of appropriate business conduct and see that the values and policies of this code are upheld. You must ensure that your direct employees/contractors receive a copy of the Code and understand and comply with its provisions. You must offer assistance and guidance to any employee/contractor who has questions or is in a difficult situation and seek input from C5MI's leadership, as needed. You are expected to counsel employees/contractors promptly when their conduct or behavior is inconsistent with this Code or the Company's policies. You must take prompt and decisive action when a violation of the Code or Company policies occurs and consult with Company resources to determine a resolution.

5-3. Violations of this Code

Violation of this Code of Ethics shall result in discipline, including possible termination of employment. These consequences may apply not only to employees/contractors who violate the Code, but also those who condone misconduct, fail to report or take reasonable measures to prevent, detect, and address misconduct, or seek to retaliate against those who, in good faith, report potential misconduct. The degree of discipline relates in part to whether there was a voluntary disclosure of any ethical violation and whether the violator cooperated in any subsequent investigation.

5-4. Reporting Violations of this Code and Employee Whistleblower Protection

C5MI is committed to the highest possible standards of ethical, moral and legal business conduct. In conjunction with this commitment and C5MI's commitment to open

communication and an open-door policy, the Company aims to provide an avenue for employees/contractors to raise concerns and the reassurance that they will be protected from reprisals or victimization for whistleblowing in good faith. However, if an employee feels that their anonymity is not required, then they should follow the Company's existing grievance procedure and manage their concern through the chain of command or Human Resources. C5MI's owners, officers, directors, and employees/contractors shall disclose all actual or suspected unethical, dishonest, fraudulent, or illegal behavior, including violations of this Code of Business Ethics or Company policies and procedures, to a member of C5MI's management team or to the Chief Compliance Officer.

To anonymously report a suspected violation of the Code of Business Ethics and Conduct, individuals can use any of the below methods:

1. Use C5MI confidential toll-free telephone hotline:
 - English-speaking USA and Canada: (866) 682-8807
 - Spanish-speaking USA and Canada: (800) 216-1288
 - French-speaking Canada: (855) 725-0002
 - Spanish-speaking Mexico: (800) 681-5340
 - All other countries: (800) 603-2869 (must dial country access code first – find instructions and access codes by clicking [here](#))

2. Use our confidential online reporting platform:
 - Primary Website: <https://report.syntrio.com/c5mi>
 - Direct URLs by Language:
 - English: www.lighthousegoto.com/c5mi/eng
 - French: www.lighthousegoto.com/c5mi/fre
 - Hindi: www.lighthousegoto.com/c5mi/hin
 - Indonesian: www.lighthousegoto.com/c5mi/ind
 - Italian: www.lighthousegoto.com/c5mi/ita
 - Japanese: www.lighthousegoto.com/c5mi/jpn
 - Portuguese: www.lighthousegoto.com/c5mi/por
 - Spanish: www.lighthousegoto.com/c5mi/spa

3. Download the anonymous reporting app on a phone:
 - Click [HERE](#) to view instructions with a QR code to download the app.
 - Use Keyword: **c5mi**

4. Make an anonymous report via email to reports@syntrio.com. Individuals using this method must include the company name (C5MI) with the report.
5. Make an anonymous report via fax: (215) 689-3885. Individuals using this method must include the company name (C5MI) with the report.

No C5MI employee/contractor will be subject to discrimination, retaliation, or reprisal of any kind for reporting or disclosing to any U.S. government official information, including confidential or proprietary information, that the employee/contractor reasonably believes is evidence of a false claim, gross mismanagement, abuse of authority, or gross waste of funds relating to a federal contract or grant, a substantial and specific danger to public health or safety, or a violation of law, rule or regulation relating to a federal contract or grant. Employees/contractors who believe they have been subject to discrimination, retaliation or reprisal for such reports or disclosures may submit a complaint to the Inspector General of the pertinent federal agency in accordance with 41 U.S.C. §4712 and 10 U.S.C. §4701 (FAR 252.203-7002).