



# **Two Six Technologies: Code of Business Ethics and Conduct**



## Welcome from Our CEO

At Two Six Technologies (TST), we do work that addresses urgent human security challenges and makes a positive impact across the globe. Our employees and their expertise help to ensure we deliver on our client commitments. Influenced by our core values, this Code of Conduct outlines our commitment to maintaining the highest ethical standards and complying with all applicable laws, rules, and regulations. We believe that adherence to these principles ensures our continued success and maintains the confidence of our customers and the communities in which we work.

**Joe Logue**

CEO, Two Six Technologies



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## 1.0 Core Commitment & Applicability

Our strong commitment to ethical behavior applies to all TST employees, members of our Board of Directors, agents, consultants, subcontractors, suppliers, and anyone else acting on our behalf.

- **Compliance:** All representatives must comply with this Code. Failure to do so may lead to disciplinary action, up to and including termination.
- **Management Accountability:** Managers and supervisors are personally accountable for their own conduct and the conduct of those reporting to them.
- **The Golden Rule:** No individual at TST, regardless of position, is permitted to direct, participate in, approve, or tolerate any violation of this Code.

## 2.0 Navigating Government Contracting

As a contractor for the United States Government and a subcontractor to prime government contractors, TST operates in a highly regulated public sector environment. The laws governing public sector procurement are complex and strict. Many behaviors that are acceptable in commercial settings are strictly prohibited when working with the government. TST is fully committed to:

- Strictly adhering to all specialized statutes, regulations, and contract terms.
- Ensuring all invoices, claims, and supporting data are entirely truthful and accurate.
- Educating our team to ensure our customer interactions never jeopardize public trust or violate compliance mandates.

## 3.0 Conflict of Interest Policies

### Organizational Conflicts of Interest (OCI)

To ensure unfair competitive advantages are avoided and our business judgment remains completely unbiased, TST actively manages and mitigates three primary types of OCIs:

- **Unequal Access to Information:** Preventing the unfair use of nonpublic information gained through government contracts.
- **Biased Ground Rules:** Ensuring we do not set procurement specifications that intentionally or unintentionally favor our own future bids.
- **Impaired Objectivity:** Guarding against situations where a TST business unit would evaluate its own performance or that of an affiliate impartially.



## Personal Conflicts of Interest (PCI)

Employees must avoid any financial interests, personal activities, or relationships that impair their ability to act impartially and in the best interest of TST or our government customers. This includes avoiding unapproved outside employment with competitors or suppliers, improper personal benefits, and conflicts arising from the actions of immediate family members.

## 4.0 Integrity in the Marketplace

### Gifts and Entertainment

TST wins business based on superior services and competitive pricing. Our interactions must always be free from the perception that favorable treatment was sought or received in exchange for business courtesies.

- **Government Personnel:** TST strictly complies with U.S. Office of Government Ethics rules. As a general rule, employees do not provide gifts, meals, travel, or entertainment to government employees, subject only to highly specific legal exceptions (such as nominal items valued under \$20).
- **Commercial Bribes and Kickbacks:** TST strictly prohibits offering, soliciting, or accepting anything of value—including money, gifts, discounts, or personal services—to influence business outcomes with customers, suppliers, vendors, or subcontractors.

### Anti-Corruption & The Foreign Corrupt Practices Act (FCPA)

Our zero-tolerance policy for bribery extends globally. No representative of TST may give, offer, or promise anything of value to a foreign government official or public international organization to obtain an improper business advantage.

### Procurement Integrity & Competitive Information

We respect the intellectual property and proprietary data of others. TST will not solicit or receive sensitive, non-public proprietary internal government data, source selection information, or a competitor's confidential proposal information. We do not engage in industrial espionage or utilize improper third-party means to gain competitive insights.



## 5.0 Business Operations & Transparency

### Accurate Books, Records, and Timekeeping

Corporate integrity requires honest record-keeping. TST is dedicated to ensuring that:

- All employee timecards and material allocations are tracked completely and accurately.
- Financial transactions are promptly recorded in accordance with accepted accounting principles.
- No "off-book" accounts, misleading entries, or falsified expense reports are ever created or tolerated.
- Relevant business documents are securely stored and retained in full compliance with legal requirements and audit standards.

### Responsible Partnerships & Vetting

We choose to do business only with individuals and companies that share our commitment to ethical standards. TST screens prospective employees, subcontractors, vendors, and consultants against the government's **System for Award Management (SAM)** database to ensure compliance and eligibility for government contracting.

## 6.0 Human Rights: Combating Trafficking in Persons

TST stands firmly against human trafficking, child labor, and forced labor in any form. In compliance with Federal Acquisition Regulation (FAR) 52.222-50, TST and its global personnel are strictly prohibited from:

- Engaging in severe forms of trafficking in persons or procuring commercial sex acts.
- Denying employees access to their identity or immigration documents.
- Charging recruitment fees to potential employees or using misleading recruitment practices.
- Failing to provide safe, standard-compliant housing or required written work contracts in languages employees understand.



## 7.0 Reporting Violations & Non-Retaliation

### Our Whistleblower Commitment

TST provides a safe and reliable environment for individuals to voice good faith concerns regarding financial controls, violations of law, abuse of authority, or endangerment of public safety.

### Zero Tolerance for Retaliation

TST strictly prohibits any form of retaliation, harassment, or negative employment consequence against anyone who raises an ethical concern in good faith or cooperates with an internal or governmental investigation.

### How to Report Concerns

TST provides multiple channels to report potential misconduct, including completely anonymous options:

- **Internal Leadership:** Contact your People Leader, Human Resources, or a member of the Leadership Team.
- **Compliance Officers:** Direct reports can be sent directly to our Chief Financial Officer (CFO) or Chief Executive Officer (CEO).
- **Board of Directors Oversight:** Email [whistleblower@twosixtech.com](mailto:whistleblower@twosixtech.com)
- **Independent Anonymous Hotline:** Managed by Lighthouse Services, Inc., available 24/7:
  - **Website:** [www.lighthouse-services.com/twosixtech](http://www.lighthouse-services.com/twosixtech)
  - **Toll-Free Phone (US/Canada):** 833-490-0007
  - **Email:** [reports@lighthouse-services.com](mailto:reports@lighthouse-services.com) (must include "Two Six Technologies" in the report)



For general inquiries regarding our ethical standards, contact the TST HR Team at: [hr@twosixtech.com](mailto:hr@twosixtech.com).



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