

# CODE OF CONDUCT



## Integrity is Our DNA

Aviation Services  
Logistics and Operations  
Security and Surveillance  
Technology Solutions

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# A MESSAGE FROM OUR CEO



*"The success of our business is dependent on the trust and confidence we earn from our customers and stakeholders."*

## OUR CODE IS OUR CORNERSTONE

Our Code of Ethics and Business Conduct (Code of Conduct or Code) serves as a compass, guiding us to a common destination. Our company values of commitment, integrity, and perseverance establish high standards of expected ethical behavior that serve as an essential part of our company's foundation. By embodying these values into our organization, we are helping ensure our future success.

It is important to know that this Code of Conduct applies to every Cambridge employee, no matter what part of the business, level, or area. Its scope also extends beyond employees and embraces our interactions and obligations to others, such as our customers, shareholders, and partners. When we live these values and hold each other accountable to them, we strengthen our corporate culture and solidify our reputation.

The importance of individual accountability to our Code of Conduct is paramount. While it may sometimes be easier to look the other way and ignore something that appears inconsistent with our Code, this is never acceptable. It is expected that employees will always do the right thing and have the moral courage to speak up and raise concerns. This is especially true in times of increased performance pressures. We must not let the challenges we face lead us to neglect our compliance and values commitments.

I invite you to join me in living our values of commitment, integrity, and perseverance and adhering to the Cambridge Code of Conduct. Together we can foster an ethical workplace culture and continue our history as a strong and trustworthy company to our employees, stakeholders, and customers.

Dr. Kim Harokopus  
Chief Executive Officer

## MISSION

To design and deliver innovative and adaptive solutions that address capacity building needs and enable our customers' success.

## VISION

To be recognized as the company that thinks boldly, works urgently, and goes anywhere to deliver solutions that stop bad actors and makes our world safer.

## VALUES



*Commitment*



*Integrity*



*Perseverance*

We apply the core values of commitment, integrity, and perseverance to deliver solutions that exceed expectations for every customer, anywhere, under any set of conditions.



*We gain credibility by adhering to our commitments, displaying honesty, acting with integrity, and reaching our goals solely through honorable conduct.*

# OUR COMMITMENT PLEDGE

Cambridge is committed to deal honestly and ethically to foster good relationships with our employees and stakeholders.

We will stand behind the following commitments:

- To our company – we pursue growth while keeping high ethical standards.
- To one another – as fellow employees, we will extend courtesy and respect while appreciating the diversity of our workforce and uniqueness of each individual.
- To our customers – we strive to maximize the value, quality, and utility of our products and services.
- To our business partners – we will be the best partner we can be by emphasizing fair competition and long-lasting relationships.
- To the communities of which we are a member – we will act as responsible and responsive corporate citizens in a moral, ethical, and beneficial manner.



## OUR COMMITMENTS TO:

- Our Company
- One Another
- Customers
- Business Partners
- Communities
- Our Code

# CONFLICTS OF INTEREST

*Commitment: Disclose and seek guidance on any issues that potentially may conflict with your responsibilities with the company.*

A conflict of interest occurs whenever you have competing interests that may interfere with your ability to make an objective decision in the best interest of Cambridge. Each of us is expected to use good judgment and avoid situations that can lead to even the appearance of a conflict of interest as it could undermine the trust that our customers, business partners, fellow employees, and the trust the public placed in us.

Some areas in which potential conflicts of interest may arise:

- Personal relationships
- Financial dealings and investments
- Outside employment

*For additional information, please reference the Conflict of Interest Policy.*

## MAKE SURE YOU:

- Always make business decisions in the best interest of Cambridge. Seek guidance to avoid potential conflicts of interest.
- Disclose potential conflicts immediately by notifying your supervisor or Human Resources in writing.



# COMPANY ASSETS

*Commitment: Appropriately use and protect company assets as well as those of our customers and suppliers.*

We are entrusted with company and Government-provided assets and are personally responsible for protecting them against theft, loss, or abuse and using them appropriately and for business purposes. Property provided by the Government customer or other third party must be used and managed according to the terms of the relevant agreement or contract.

## Information Technology

Information technology is a valued asset and is provided for the business use of our employees. We should use Cambridge information technology such as internet, email, computers, and mobile devices for authorized, business purposes and may not use these resources to view, download, or communicate inappropriate, unprofessional, or illegal content. This includes content that could be considered obscene or offensive, unlicensed software, and copyrighted materials.

Personal use of Cambridge information technology is discouraged and should be kept to a minimum. Any occasional personal use of our information technology should not adversely affect your productivity or the work environment.

Since company provided information technology belongs to Cambridge, you should not have an expectation that emails, internet activity, computer files, and the like are private. Cambridge reserves the right to review all information technology usage and will do so in accordance with the law.

### MAKE SURE YOU:

- Immediately report any suspicions of fraud, theft, or misuse of company assets.
- Do not share passwords or allow other people to use company resources.
- Do not attempt to access any data that you are not authorized to view.
- Do not download, install, or run unauthorized or unlicensed software on company information technology.
- Never copy, install, or use company software for personal purposes.

*For additional information, please reference the Company Vehicle Policy, Government Property Management Policy, and the IT Acceptable Use Policy.*

# SENSITIVE INFORMATION

*Commitment: Protect intellectual property and company proprietary, customer confidential, and classified information from unauthorized disclosure.*

## Proprietary Information

Cambridge proprietary information is one of our most valuable assets, and each of us must be vigilant in protecting it. This means keeping company proprietary information secure, limiting access to those who have a need to know, and avoiding discussions in public areas. It is also expected that you will not share the Cambridge's proprietary information with anyone outside the company, even after your employment with Cambridge ends.

### MAKE SURE YOU:

- Use and disclose company proprietary information only for legitimate business purposes and when authorized.
- Properly label proprietary information to indicate how it should be handled and distributed.
- Dispose of proprietary information in designated receptacles.
- Know which types of information are given heightened protection by the law and company policy such as personally identifiable information, Government-issued identification numbers, and bank account numbers.

## Customer Confidential Information

Our customers place their trust in us, and, in turn, we must protect their confidential information. We may only disclose confidential information to co-workers who have a legitimate business need to know customer information and should not disclose it to people outside our company without authorization.

### MAKE SURE YOU:

- Understand and adhere to the laws, regulations, company policy, and agreements on the use, protection, and retention of information from or about customers.
- Immediately report any loss of customer information.
- Take steps to ensure that customer information is secure when off company premises.
- Never use customer information for personal gain.



# SENSITIVE INFORMATION (CONCLUDED)

## Classified Information

In many situations, the U.S. Government or foreign governments have entrusted special information to us which may be classified or require special handling. We have a continuing obligation to protect classified information. We are required to properly safeguard and control access to this information in accordance with the security guidelines prescribed by the contract, country, or Government agency.

### MAKE SURE YOU:

- Are familiar with applicable security regulations and hold the applicable clearance prior to accessing classified information.
- Immediately report any suspected security infraction.
- Only give individuals access to classified information if it has been approved.

Cambridge must protect our intellectual property as a corporate asset. We must also safeguard the intellectual property entrusted to us by others, particularly customers, suppliers, and business partners, and not infringe upon the intellectual property rights of others.

### MAKE SURE YOU:

- Report any suspected theft, misuse, or improper disclosure of the company's intellectual property.

*For additional information, please reference the Standard Practice and Procedure (SSP) Policy.*

## Intellectual Property

Cambridge retains exclusive ownership of the intellectual property of any idea, process, trademark, invention, or improvement you create while working for Cambridge.

# INDUSTRIAL SECURITY PROGRAM

*Commitment: We will maintain an Insider Threat Program to detect, deter, and mitigate insider threats.*

Cambridge will maintain a National Industrial Security Program (NISP) as promulgated by the NISP Operating Manual (NISPOM); Intelligence Community Directives (ICD); and other related laws, regulations, or programs designed to protect classified or sensitive information as required by contract or agreement.

Cambridge will report all adverse information to the Department of Defense (DoD) through the Joint Personnel Adjudication System (JPAS) and other applicable Intelligence Community (IC) Government agencies.

## Information Security

Cambridge is committed to protecting the confidentiality, integrity, and availability of corporate, customer, and business partner data for which it has stewardship through a comprehensive and systematic information security program.

*For additional information, please reference the Industrial Security Policy.*

## SOCIAL MEDIA

*Commitment: Use social media responsibly and in accordance with company values and policies.*

If you participate in online forums, blogs, wikis, chat rooms, bulletin boards, or other social networks, never give the impression that you are speaking on behalf of Cambridge unless you are authorized to do so. If you reveal that you are a Cambridge employee, make it clear that your views are yours alone. Despite privacy settings, all social media platforms are inherently public communication channels, so always think carefully before posting content online.

*For additional information, please reference the Social Media Policy.*

### MAKE SURE YOU:

- Never post company confidential, export restricted, or classified information.
- Never post false information or anything that might defame others or damage our brand or reputation.

## GIFT, ENTERTAINMENT, AND COURTESIES

*Commitment: Cambridge takes a zero-tolerance policy on acceptance or provision of gifts, entertainment, and courtesies to all government officials, U.S. and foreign.*

Conducting business with integrity means never seeking to improperly influence business decisions. We must always avoid situations where business courtesies could harm the reputation of our company or those of us involved. Please note that we may never attempt to circumvent these rules by using our personal funds or by engaging an agent or representative to pay for any business courtesy that we cannot pay ourselves. The rules outlined in this section also govern the actions of our family members and close friends, as well as those of Cambridge's agents and representatives.

*For additional information, please reference the Gifts, Meals, and Business Gratuities Policy.*

### MAKE SURE YOU:

- Refrain from offering or giving a business courtesy to a U.S. Government official.
- Exercise caution when dealing with business partners, which could appear to be privately owned but are actually considered Government entities.

# EQUALITY, DIVERSITY, AND INCLUSION

*Commitment: Maintain an inclusive and diverse work environment free from discrimination and harassment.*

We bring together employees with a wide variety of backgrounds, skills, and cultures. We value different ideas, opinions, and experiences and are committed to sustaining a culture of inclusion and diversity. Combining such a wealth of talent and resources creates the diverse and dynamic teams that consistently drive outstanding results.

We do not tolerate discrimination of any kind. We provide equal employment opportunities for all regardless of race, color, religion, gender, national origin, age, sexual orientation, physical or mental disability, military/veteran status, marital status, gender identity, genetic information, ethnic background, or any other legally protected classification.

We do not tolerate harassment of any kind. Verbal or physical conduct that harasses another; disrupts another's work performance; or creates an intimidating, offensive, abusive, or hostile work environment will not be tolerated. Harassing conduct can include inappropriate gestures, remarks, touching, or displaying sexually explicit or offensive pictures. Promises of promotion or special treatment in return for sexual favors also constitute harassment.

*For additional information, please reference the Anti-Discrimination Policy.*

## MAKE SURE YOU:

- Treat others respectfully, professionally, and promote diversity.
- Avoid making comments or jokes and sending or posting materials.
- Avoid discrimination against others on any basis.
- Review your own decisions to ensure you are using objective and quantifiable standards to drive your actions.
- Report all incidents of discrimination, harassment, and intimidation.

# SAFE AND HEALTHY WORKPLACE

*Commitment: Maintain a safe, healthy, and secure work environment.*

Cambridge is committed to providing a safe, healthy, and secure workplace for colleagues and visitors to our facilities and to operating in an environmentally sound manner. Cambridge requires that all employees practice safe work habits and follow all applicable safety, security, and health rules and practices.

## MAKESURE YOU:

- Review and follow the safety, security, and health rules and practices.
- Complete required training and follow the additional security procedures.
- Immediately report any practices or situation, regardless of severity, that could pose a threat to the environment or the safety or health of anyone.

## Drugs and Alcohol

To maintain a safe workplace, it is essential that we are able to think clearly and react quickly. Any involvement with illegal drugs including their use, possession, distribution, purchase, sale, offer for sale, or manufacture, while on Cambridge's premises,

on company time, or when conducting or travelling on company business is prohibited. The abusive use of controlled substances including prescription drugs or alcohol is also prohibited. The only exception to this rule is when alcohol is consumed responsibly and in observation of applicable laws at business dinners or in accordance with local management direction at an authorized company event.



*We are committed to providing a professional, respectful, and safe work environment. We owe it to each other to be honest and respectful. We should treat others as we would want to be treated.*

***For additional information, please reference the Environmental, Health, and Safety Policy.***



# WORKPLACE VIOLENCE

Violence of any kind has no place at Cambridge. We will not tolerate any acts or threats of physical violence against co-workers, visitors, or anyone on Cambridge's property, or by any representatives of Cambridge during company travel or company-sponsored events.

Every threat of violence is serious. You are expected to immediately report any observations of violence to your supervisor, any member of management, Human Resources, or Security.

## PROHIBITED ACTIVITIES INCLUDE:



- Threatening remarks or behavior, obscene phone calls, or stalking.
- Assaults or causing physical injury to another.
- Intimidation or acting aggressively in a manner that causes someone else to fear injury.
- Intentionally damaging someone else's property.
- Bringing prohibited items into company facilities or to company-sponsored events, such as explosives (fireworks, firearms, or ammunition), knives, or other weapons.

# PRIVACY OF EMPLOYEE INFORMATION

*Commitment: Handle employee information responsibly.*

For those of us who have access to personal information related to our colleagues and others, we have an obligation to protect this information and exercise caution prior to disclosing it to others. This includes, but is not limited to, medical, payroll, and personally identifiable information. We may only provide employee information to other employees and third parties where permitted by law, company approval, or employee permission.

*For additional information, please reference the Information Security Policy.*

## MAKE SURE YOU:

- Learn which types of information are given heightened protection by the law and company policy (such as Government issued identification, bank account numbers, and medical records) and protect them through appropriate means (such as encryption or other types of limited access).
- Protect the confidentiality of personal information of current and former colleagues, as well as job applicants, business partners, and customers.
- Don't access, discuss, or share confidential information unless there is a legitimate business reason to do so.
- Immediately report any loss or inadvertent disclosure of confidential employee information.
- Ensure recipients of employee information will safeguard the information.

# HONEST AND ETHICAL DEALINGS

*Commitment: Maintain a culture of integrity by being honest and ethical in business relationships.*

We treat all our business relationships fairly: the Government, our non-Government customers, business partners, third parties, suppliers, and contractors. We work to understand and meet their needs while always remaining true to our own ethical standards. We tell the truth about our services and capabilities, and we do not make promises we know we cannot keep. In short, we treat our business partners as we would like to be treated.

We expect our customers, business partners, and stakeholders to act in a manner that is consistent with our ethical standards and we must bring suspected unethical or illegal activity on their part to the immediate attention of your supervisor or any Cambridge senior management official.

*For additional information, please reference the Business Ethics and Compliance Policy.*

## MAKE SURE YOU:

- Talk to your supervisor if you have concerns about any error, omission, undue delay, or defect in quality or customer service.
- Report pressure from colleagues or managers to cut corners on quality or delivery standards.
- Never follow a customer or third-party request to do something that you regard as unethical or unlawful.
- Respond promptly to customer and business partner requests and questions.
- Promise what you can deliver; deliver what you promise.

## FAIR AND ACCURATE BILLING

*Commitment: Submit an accurate and complete preparation of work performed as reflected on every timesheet.*

Contractual obligations and different statutes and regulations require accurate reporting of labor hours for recording contract labor costs and creating payroll expense. Cambridge policy is to maintain a reliable and accurate timekeeping system that accurately records labor for all clients and complies with U.S. Government timekeeping requirements.

Accurate and complete preparation of timesheet is the employee's responsibility. Careless or improper preparation may lead to disciplinary actions under company policies, as well as applicable federal statutes.

### MAKE SURE YOU:

- Familiarize yourself with the Cambridge timekeeping procedures.
- Be prepared at any time to demonstrate compliance during internal and Government audits.

*For additional information, please reference the Timecharging Policy.*

## ORGANIZATIONAL CONFLICT OF INTEREST

*Commitment: Disclose in a timely manner any potential organizational conflict of interest.*

We are required to recognize and avoid organizational conflicts of interest (OCI) in connection with direct or indirect contracts with our customers. An OCI may arise where activities of the company, our employees, partners, or competitors could impair the ability of another to render impartial services to a direct or indirect contract with the Government. This could also give an unfair advantage in competing for a contract because of access to information obtained as a result of other contractual relationships with the customer.

### MAKE SURE YOU:

- Promptly report any OCI.
- Seek pre-approval from senior management before engaging in any negotiations.
- Recuse yourself from negotiating business dealing with OCI.

*For additional information, please reference the Organizational Conflicts of Interest Policy.*

# CONTRACTING WITH THE U.S. GOVERNMENT

*Commitment: Conduct business with the U.S. Government in an ethical and compliant manner.*

In the ordinary course of its business, Cambridge makes numerous submissions, certifications, and representations to the U.S. Government and to prime contractors performing under U.S. Government contracts.

Disregarding these principles and expectations can expose Cambridge to price reductions, the withholding of payments, civil and criminal fines and penalties, contract termination, suspension and debarment, and will be grounds for appropriate disciplinary action, including termination of employment.

Individuals found guilty of violations of certain laws and regulations referenced in this policy may also be subject to fines, imprisonment, and suspension and debarment.

Moreover, there are severe criminal and civil sanctions for submitting a false claim where U.S. Government funds are used to pay or reimburse a portion of the price. To avoid allegations of false statements or false claims, always tell the truth in any communications or submissions that may relate to contracting with the U.S. Government. If there is any doubt about the accuracy of a statement, do not make the statement or represent it to be accurate. Information should be carefully checked to ensure its accuracy before submission.

*For additional information, please reference the Contracting with the U.S. Government Policy, Internal Investigations Policy, Mandatory Disclosure Policy, and the Non-Retaliation Policy.*

SOME EXAMPLES WHERE YOU NEED TO CAREFULLY CHECK TO ENSURE ACCURACY:

- Recording, allocating, and charging costs
- Preparing proposals and negotiating contracts
- Dealings with subcontractors
- Design, manufacture, and testing of products
- Zero gift, entertainment, or gratuities for public employees
- Prohibition on kickbacks, OCI, fraud, bribery, waste, and abuse
- Proper use of Competitively Sensitive Information

## PROCUREMENT INTEGRITY

*Commitment: Understand and comply with the procurement integrity laws and regulations.*

Since we conduct business with the U.S. Government, foreign governments, and various government-owned entities, we are committed to comply with many special legal, regulatory, and contractual requirements that apply to Government contracting. In compliance with the Procurement Integrity Act, we will not disclose or use any unauthorized confidential contractor bid or proposal information or source selection information before a contract award. Employees should contact their supervisor or Cambridge senior management with questions specific to contracting with the Government.

*For additional information, please reference the Contracting with the U.S. Government Policy and the Hiring Former Government or Military Personnel Policy.*

## HIRING FORMER GOVERNMENT OR MILITARY PERSONNEL

The U.S. Government and other countries have laws and special restrictions that apply to the recruitment and hiring of current and former Government employees and military personnel as employees, consultants, or representatives. Restrictions include limitations on the type and timing of employment-related discussions that Government employees may have with Cambridge. We must ensure that such employment discussions are approved in advance by Cambridge Human Resources and senior management.

### MAKE SURE YOU:

- Avoid seeking or receiving information the company is not authorized to possess, such as confidential or proprietary data, pricing information of other competitors, and non-public Government documents relating to bidding or source selection.
- Seek immediate guidance from Cambridge's senior management if you inadvertently receive unauthorized bid or proposal or source selection information.
- Comply with Government conflict of interest restrictions.



# BUSINESS PARTNER RELATIONS

*Commitment: Business partner relationships must be based on mutual trust and a commitment to act with integrity.*

We deal fairly with our suppliers, consultants, and other third parties and we expect them to act with integrity. In dealings with Cambridge, we expect business partners to follow the spirit of the Code of Conduct, as well as any applicable contractual provisions, when working on behalf of Cambridge.

## Due Diligence

Appropriate due diligence must be performed by Cambridge before engaging any third party that will be marketing or distributing Cambridge products and services outside the U.S., including enhanced due diligence for third parties who will have contact with U.S. Government and non-U.S. government customers and other Government employees and officials on behalf of Cambridge.

## Supplier Diversity

Recognizing the importance and benefits of a diverse supplier base, we will work to identify qualified

minority and woman owned business enterprises and small business and local business enterprises capable of providing products and services.

## Subcontractor Code of Ethics Provisions

For U.S. Government contracts above a specific value, the law requires that we will ensure applicable subcontracts include the provision to have and maintain a code of conduct and an ethics and compliance program that includes training, an internal reporting mechanism, and discipline for code violations.

## Product Origin, Quality, and Substitution

Our customers, both Government and commercial, have the right to insist on strict compliance with contract requirements. We must only deliver products that conform to the contract's specified requirements. We must avoid the substitution of lower quality, different, or inadequately tested products. We must also ensure that suppliers of raw materials, parts, and components used in our products meet our contract requirements.

*For additional information, please reference the Gifts, Meals, and Business Courtesies Policy.*

# ANTI-TRUST AND FAIR COMPETITION

We believe in fair and open markets and never engage in improper practices that may limit competition. We compete vigorously to be an industry leader, and we do so by maintaining high standards of fairness and honesty when engaged in marketing, promotional, and advertising activities. We look to gain competitive advantage through superior performance, price, and quality; not through unethical or illegal business practices.

We do not enter into agreements with competitors to engage in any anti-competitive behavior, including setting prices or dividing up customers, suppliers, or markets.

*For additional information, please reference the Anti-Trust and Fair Competition Policy.*

## MAKE SURE YOU:

- Never share Cambridge's sensitive information with a competitor of the company.
- Never share sensitive information of business partners or other third parties with others without their permission.
- Never take advantage of anyone through manipulation, abuse of privileged information, misrepresentation of facts, or any other intentionally unethical or illegal action.
- Never engage in conversations with potential competitors about competitive sensitive information.
- Never use non-public information about potential competitors from new hires or candidates for employment.

# ANTI-CORRUPTION/BRIBERY

*Commitment: Do not offer or provide bribes to influence action or accept kickbacks in connection with company business.*

Cambridge is committed to conducting business ethically, with integrity, and in compliance with applicable laws and regulations prohibiting bribery, kickbacks, and other forms of corruption in our operations worldwide. Because of the complexity of anti-corruption and bribery laws, it is important that employees are aware of company policies and ask questions if they have any doubts about the proper course of action. Bribery and kickbacks are never permitted at Cambridge, regardless of whether we are dealing with a Government or commercial customer.

It is especially important that employees carefully monitor third parties acting on the company's behalf. Our third parties must understand that they are required to operate in strict compliance with our standards and to maintain accurate and complete books and records.

Facilitation payments are not allowed. If you are solicited for a facilitation or expediting payment, contact Cambridge senior management immediately. You must obtain approval from Cambridge senior management before making a facilitating payment no matter how small the amount is.

*For additional information, please reference the Anti-Corruption Policy.*

## MAKE SURE YOU:

- Never directly or indirectly offer, provide, or authorize money or any item of value to improperly obtain or retain business or to improperly influence a Governmental action.
- Never make payments that are intended to improperly influence a Government official or private person.
- Never directly or indirectly request, agree to receive, or accept kickbacks, payoffs, or other personal payments in connection with company business.

# EXPORT AND IMPORT COMPLIANCE

*Commitment: Fully comply with export and import laws and do not trade with sanctioned or embargoed countries or entities.*

In the U.S. as well as other countries in which Cambridge operates, governments often have complex and significant restrictions on trade in military and dual-use goods, technology, and services, as well as trade with certain countries. Cambridge complies with all trade restrictions and import and export control laws of the countries in which we operate. We expect all our business partners, third parties, consultants, and contractors to do the same.

Export rules may restrict the following:

- Any oral discussion with any non-U.S. person, even someone inside the U.S.
- Using business knowledge outside the employee's country.
- Transferring technical data to someone in another country.
- Transferring technology to non-U.S. persons, whether located inside or outside the U.S.
- Transferring technology from an authorized non-U.S. person to one that is not authorized.
- Transporting company assets with certain technology.

Trade restrictions also involve prohibitions against dealing with specifically identified sanctioned or embargoed countries or entities acting on their behalf, as well as on transactions involving certain named persons or organizations.

*For additional information, please reference the Export Control and Compliance Policy.*

## MAKE SURE YOU:

- Comply with all export and import laws and regulations.
- Report any known or suspected trade control violation to any Cambridge senior management.

# HUMAN TRAFFICKING

*Commitment: Recognize and adhere to internationally recognized human rights provisions.*

We support human rights by complying with internationally recognized provisions in all locations where we operate, regardless of local business customs. We are committed to providing safe and secure conditions for those working on our company's behalf.

We will not work with business partners who employ children or forced labor, including prison or bonded labor. We will not tolerate physical punishment or abuse. We will not engage in human trafficking-related activities to include misleading or fraudulent recruiting practices, charging our employees recruiting fees, confiscating or destroying employee identification documents, or supporting prostitution. It is a violation of company policy for employees to, directly or indirectly, purchase commercial sex acts for themselves, for the benefit of employees or third parties, or while conducting company business.

*For additional information, please reference the Human Trafficking Prevention Policy.*

## MAKE SURE YOU:

- Immediately report any suspected potential human rights related violations.
- Strictly prohibit use of child or forced labor, including prison or bonded labor.
- Obey the associated laws and regulations and where these laws vary or conflict, follow the highest standards.

# ACCURACY OF RECORDS

*Commitment: Maintain current, accurate, and complete business records.*

Our shareholders, business partners, customers, Government officials, and the public need to be able to rely on the accuracy and completeness of our disclosures and business records. Accurate information is also essential within the company so that we can make good decisions.

We are responsible for honesty and transparency in the preparation and maintenance of our business records, including our timecards; expense reports; and quality, safety, and procurement records. Employees with a role in financial or operational recording or reporting have a special responsibility in this area, but all of us contribute to the process of recording business results and maintaining records. Each of us is responsible for helping to ensure the information we record is accurate, complete, and maintained in a manner that is consistent with our internal controls.

We expect our employees, colleagues, business partners, suppliers, and others with whom we conduct business to create accurate records and not alter any record entry to conceal or misrepresent the underlying transaction represented by it. All records, regardless of format, made or received as evidence of a business

transaction must fully and accurately represent the transaction or event being documented. When a record is no longer needed to conduct current business, records should still be retained based on the applicable retention requirements. Suppliers performing as U.S. Government contractors (whether direct or indirect) must comply with the requirements in FAR 4.703. Suppliers that are performing or fulfilling a U.S. Government role in their prescribed work must comply with the records requirements of the affected agency and any relevant National Archives and Records Administration (NARA) requirements that apply to that agency.

## Records Retention

We are responsible for the information and records under our control. It is also our responsibility to keep our records organized so that they can be located and retrieved when needed. Documents will be maintained in accordance with our record retention schedule.

*For additional information, please reference the Records Retention Policy and the Timecharging Policy.*



# ENVIRONMENTAL STEWARDSHIP

*Commitment: Protect the environment and conserve natural resources.*

We conduct our business in a way that protects the environment for future generations. We work with our business partners and suppliers to strengthen environmental stewardship and responsibility while respecting the communities where we do business.

We are committed to meeting or exceeding applicable environmental laws and regulations, company policies, and to continuously improve our environmental performance through resource conservation, waste minimization, water and energy efficiency, and the effective use of raw materials.

## Environmental Health and Safety

Cambridge's commitment includes providing safe and healthy operations for its employees, its customers, and the public, assuring compliance with applicable environmental safety and health requirements.

*For additional information, please reference the Environmental Health and Safety Policy.*

### MAKE SURE YOU:

- Comply with all applicable environmental laws, regulations, and company policies.
- Report any incident or condition that might result in an environmental violation, pose a hazard, or waste natural resources.
- Do your part to reduce water and energy use.
- Identify opportunities for improving our conservation and recycling efforts.

# COMPETITORS' INFORMATION

*Commitment: Obtain competitive information only through proper means.*

Information about competitors is a valuable asset in today's competitive business environment. When collecting business intelligence, Cambridge employees and others who are working on our behalf must always live up to the highest ethical standards.

We must never engage in fraud, misrepresentation, or deception to obtain information. Nor should we use invasive technology to spy on others. We also need to be careful when accepting information from third parties. You should know and trust their sources and be sure that the knowledge they provide is not protected by trade secret laws or non-disclosure or confidentiality agreements.

When Cambridge employs former employees of competitors, we recognize and respect the obligations of those employees not to use or disclose the confidential information of their former employers.

*For additional information, please reference the Contracting with the U.S. Government Policy.*

## MAKE SURE YOU:

- Do not request or receive the confidential information of other companies.
- Never pressure new employees to discuss confidential information from their previous employer.
- Do not disclose suppliers' non-public pricing information.
- Never retain papers or computer records from prior employers in violation of laws or contracts.
- Do not seek information obtained through any behavior that could be construed as espionage, spying, or which you would not be willing to fully disclose.

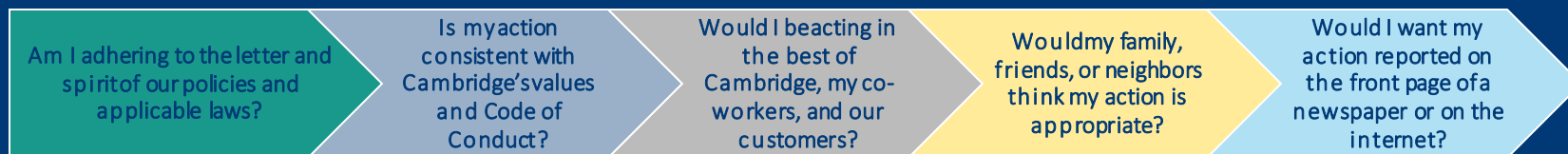
## SCOPE AND APPLICATION

This Code of Conduct applies to all employees, officers, and directors of Cambridge. Certain business partners and third parties, such as suppliers, agents, representatives, contractors, subcontractors, and consultants serve as an extension of Cambridge and as such, are expected to conduct themselves according to our values and standard of ethics when working on behalf of Cambridge.

## MAKING ETHICAL DECISIONS

We all take pride in our work and in the choices we make on behalf of Cambridge. These choices may be more difficult to make when we encounter ethical challenges.

When faced with a difficult ethical decision, ask yourself the following questions to determine whether the action you are considering is appropriate:



*If you can't answer yes to all these questions or are unsure as to what action is appropriate, seek guidance by speaking with your supervisor or any of the other resources listed in this Code.*

## EMPLOYEE RESPONSIBILITIES

Each of us must take personal responsibility for acting according to our company values and this Code, even when this means making difficult choices. We must be committed to living our values and using our Code as a guide for interactions with our stakeholders, including fellow employees, customers, business partners, shareholders, suppliers, third parties, Government agencies, and communities.

Accordingly, we have the responsibility to:

- Live our company values and abide by the Code, Cambridge policies, and the laws and regulations that pertain to an individual's particular job responsibilities.
- Report concerns about possible violations of the Code, Cambridge policy, or laws and regulations.
- Complete all required employee training in a timely manner and keep up-to-date on current standards and expectations.

It is important to note that violations of the Code, Cambridge policies, or laws and regulations may result in disciplinary action up to and including termination, or legal proceedings and penalties including, in some circumstances, civil or criminal prosecution for both the individual involved and Cambridge.

*For additional information, please reference the Anti-Harassment Policy; Drug, Alcohol, and Smoke free Workplace Policy; and the Employee Handbook.*

# SUPERVISOR RESPONSIBILITIES

Officers, supervisors, and managers have the following additional responsibilities:

- Lead by example and model the highest standards of ethical business conduct and our company values.
- Take the time to ensure your employees know how to use the Code and how to seek additional help.
- Help create a work environment that focuses on building relationships, recognizes effort, and values mutual respect and open communication.
- Be proactive. Look for opportunities to discuss and address ethics and challenging situations with others.
- Create an environment where everyone feels comfortable asking questions and reporting known or potential violations of the Code, policies, or the law.
- Strictly avoid acts of retaliation or behavior that may be perceived by others as retaliation against those who report concerns.
- Respond in a timely and effective manner to concerns which are brought to your attention, but do not feel you must give an immediate response. Reflect, seek advice, and respond later, if needed.
- Never ask or pressure anyone to do something that you would be prohibited from doing yourself.
- Hold employees accountable for completing all training requirements.

*For additional information, please reference the Supervisor Toolkit.*

# COMPLIANCE WITH LAWS AND REGULATIONS

As a Cambridge employee, regardless of nationality or country location, you are responsible for being aware of relevant laws and regulations that apply to your work. You must be vigilant in compliance and alert to changes in the law or new requirements that may affect your responsibilities.

Working globally can raise additional ethics and compliance issues as local business and cultural practices vary. While we respect the norms of our customers and colleagues throughout the world, we must comply with applicable laws and regulations.

## Mandatory Disclosure

*Commitment: If you observe or suspect any illegal or unethical behavior, you are expected to raise the issue to your supervisor or one of the other resources listed at the end of this section.*

All Cambridge employee and stakeholders are required to report possible violations of the Code, company policy, or laws and regulations, specifically whenever there is a possible violation involving fraud, conflict of interest, bribery, gratuities, waste, abuse, mismanagement, or a significant overpayment.

*For additional information, please reference the Disciplinary Guidance and Enforcement Policy and the Mandatory Disclosure Policy.*

## Cooperating With Inquiries and Investigations

*Commitment: Cooperate with all internal and external inquires and investigations.*

You are expected to fully cooperate with internal and external audits, investigations, and inquiries conducted by Cambridge. In addition, withholding information or knowingly giving false or misleading information is a serious violation of our duties as employees. In the course of business, you may receive inquiries or requests for information from Government officials. If you learn of a potential Government investigation or inquiry, immediately notify your supervisor and any of the people listed in this Code prior to taking any action.

With respect to all audits, investigations, and inquiries, you must NOT:

- Destroy, alter, or conceal any document
- Provide or attempt to influence others to provide incomplete, false, or misleading statements to a Cambridge or Government investigator.

## NON- RETALIATION/WHISTLEBLOWER PROTECTION

*Commitment: There is no tolerance of retaliation for those employees who, in good faith, report possible ethics or compliance violations.*

You can report suspected ethical violations in confidence and without fear of retaliation. Cambridge will not tolerate any retaliation against an employee who, in good faith, asks questions; reports possible violations of the Code, policy, or law; or participates in an investigation.

Reporting *in good faith* means making a genuine attempt to provide honest, complete, and accurate information, even if it later proves to be unsubstantiated or mistaken. Retaliation is a violation of our Code, and knowledge or suspicion of retaliation should be immediately reported.



*For additional information, please reference the Non-Retaliation Policy.*

## EXPECTATIONS WHEN USING THE HELPLINE

*Commitment: The Lighthouse Helpline and website are always available, and all reports will be investigated thoroughly and confidentially.*

The Lighthouse Helpline is available 24 hours, seven days a week. This independent third-party provider facilitates the documentation of your concerns and forwards them to the appropriate compliance contact within Cambridge to address.

When making a report, you are encouraged to identify yourself. Doing so facilitates communication and helps Cambridge resolve the situation. However, in the U.S. and elsewhere as allowed by local law, you may make a report anonymously. If you choose to report anonymously, it is important that you check back with Lighthouse Helpline as we may have posted additional questions to help us with our investigation, or we may have provided feedback to you on your concern. All communications are facilitated by the third-party provider. Access to reported issues is restricted, secure, and confidential in a manner consistent with conducting a thorough investigation and meeting any legal requirements. All issues are thoroughly investigated and, if appropriate, corrective actions are implemented.

### Cambridge Lighthouse Helpline

USA and Canada: English (844) 490-0002 / Spanish: (800) 216-1288

All other countries: (800) 603-2869

*For additional information, please reference the Internal Investigations Policy.*



## ASKING QUESTIONS AND RAISING CONCERNS



In most cases, you should first contact your supervisor to raise your concerns. However, if you are uncomfortable talking to your supervisor, contact a member of the Executive Management Team.

You also have the option to report concerns using the Lighthouse Reporting Helpline via telephone or online at:

- English speaking USA and Canada: (844) 490-0002
- Spanish speaking USA and Canada: (800) 216-1288
- All other countries: (800) 603-2869
- [The Lighthouse Website](#)