

Living Our Values

In its commitment to excellence and social responsibility, Obsidian operates with a strong foundation of ethical principles. This Supplier Code of Conduct serves as a guide for all employees and Suppliers, outlining our core values and expected behaviors in every aspect of our operations. By adhering to these principles, we ensure our legal compliance and also foster a culture of trust, integrity, and respect with our employees, clients, and the communities we serve.

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SUPPLIER CODE OF CONDUCT

Obsidian Solutions Group and its affiliates commit to conducting business with uncompromising ethical standards and in full compliance with all laws and regulations. As a Government contractor, Obsidian has a special role as a steward of public resources. While conducting business, integrity must underlie all relationships and we expect that Suppliers will honor the same values. Obsidian expects every Supplier to ensure they provide their employees a safe working environment, treat their employees with dignity and respect, adhere to the highest standards both personally and professionally, and comply with all applicable laws in all countries in which they conduct business. It is our belief that maintaining such standards embodies the overall sacrifice and commitment necessary in supporting a great nation and that the highest possible standard shall always remain the moral compass that guides performance, as laid out in this Supplier Code of Conduct (Code). Suppliers and their employees must not engage in any conduct or activity that may raise questions as to the Company's honesty, impartiality, or reputation, and ensure these requirements are met within their supply chain. Every action should be judged by considering whether it is legal, fair to all concerned, and in the best interests of our employees and customers, including the United States Government.

Scope

Our code applies to all third parties with which Obsidian Solutions Group does business, which includes subcontractors, suppliers, distributors, partners, consultants, and any other entity acting on behalf of Obsidian.

Mission and Quality

Our mission at Obsidian Solutions Group is to enable the effective use of Information Technology, delivering products and services that meet the needs of our customers and achieve the highest level of customer satisfaction. To this point, the Company expects Suppliers to ensure their work products and environment meet Obsidian's quality standards, effectively implement quality assurance processes to identify defects and implement corrective actions, and facilitate the production and delivery of a product whose quality meets contract requirements.

Compliance with Laws

The Company and its Suppliers must obey all applicable laws and regulations in the performance of its services, including local laws and regulations outside of the United States where the Supplier conducts business or maintains a place of business.

LABOR AND HUMAN RIGHTS

Obsidian is committed to supporting human and workplace rights in our supply chain. We expect our Suppliers to demonstrate their commitment to human rights. Anyone can report a potential violation of these commitments anonymously using Obsidian's Hotline. The Obsidian Hotline Number is 1-877-503-0222, Ext. 120.

Equal Opportunity

All suppliers must have and adhere to policies on equal employment opportunity which prohibit discrimination based on race, color, religion, national origin, sex, age, physical, mental, or veteran disability, or any other status or classification protected by applicable federal, state, or local law. This

policy applies to all terms and conditions of employment, including recruiting, hiring, transfers, promotions, terminations, compensation, and benefits.

Anti-Discrimination and Anti-Harassment

Obsidian expects its Suppliers to maintain a work environment free from all forms of discrimination and harassment. In keeping with this commitment, the Company will not tolerate harassment or discrimination by anyone or retaliation against anyone for reporting harassment, assisting in making such a report, or cooperating in a harassment investigation.

Child Labor

Obsidian is committed to respecting human rights and requires this same commitment from all Suppliers. All Suppliers will ensure that illegal child labor or forced labor is not used in the performance of work on behalf of Obsidian.

Involuntary Labor or Human Trafficking

Suppliers shall not traffic in persons or use any form of slave, forced, bonded, indentured, or involuntary prison labor and comply with applicable regulations prohibiting human trafficking including, without limitation, Federal Acquisition Regulation (FAR) 22.17 and all applicable local laws in the countries and locales in which the Supplier conducts business. This includes the transportation, harboring, recruitment, transfer, or receipt of persons by means of threat, force, coercion, abduction, fraud, or payments to any person having control over another person for the purpose of exploitation. Suppliers are expected to educate employees on prohibited activities, discipline employees who violate applicable law, and notify the contracting officer of violations and actions taken against employees responsible for such violations.

Wages and Benefits

Suppliers shall pay all workers at least the minimum wage required by applicable laws and regulations and provide all legally mandated benefits. Suppliers also shall comply with all applicable maximum working hours laws and regulations and shall compensate workers for overtime hours at or above the rate required by applicable laws and regulations.

Subcontractor Compliance

Suppliers agree that any workers supplied by subcontractors to work at the Supplier's facilities will be treated in a manner consistent with the principles set forth in this Supplier Code.

HEALTH AND SAFETY

Suppliers shall comply with all applicable health, safety, and environmental laws and regulations. Suppliers should address the following in their health and safety programs.

Occupational Safety

Suppliers shall commit to the safety and health of their employees, and shall ensure that required personnel training has been completed prior to initiating any work activity. Suppliers should have or subscribe to a written safety and health program. Suppliers are responsible for addressing and controlling workers' exposure to potential safety hazards in conformance with all applicable standards and/or regulations and by using suitable means; e.g., design, engineering, and administrative controls, preventive maintenance, training, work procedures, and appropriate personal protective equipment.

Emergency Preparedness

Suppliers shall have emergency plans and response procedures that implement all applicable laws and regulations regarding: emergency preparedness, reporting, and notification; evacuation procedures, training and drills; appropriate hazard detection and suppression equipment; and adequate exit facilities from Suppliers' sites.

Occupational Injury and Illness

Suppliers shall have procedures and systems to manage, track and report occupational injuries and illnesses, and exposure of workers to chemical, biological, and physical agents. These procedures and systems shall implement all applicable laws and regulations, including, as applicable, provisions to (i) encourage worker reporting, (ii) classify and record injury and illness cases, (iii) investigate cases, and (iv) implement corrective actions.

ENVIRONMENTAL

We expect our Suppliers to integrate environmental responsibility into their operations and minimize adverse effects on the community, the environment, and natural resources, while safeguarding the health and safety of workers and the public. Suppliers shall also comply with all applicable health, safety, and environmental laws and regulations when conducting business. By way of example, Suppliers shall:

- Obtain and keep current all required environmental permits and registrations;
- Reduce, control, and/or eliminate wastewater, waste and pollution at the source;
- Reduce, control, and/or eliminate air emissions of volatile chemicals, corrosives, particulates, aerosols and combustion products;
- Conform to applicable labeling and warning requirements;
- Identify, manage, store, move, and handle hazardous substances in accordance with laws, and
- Maintain a program appropriate to their size and resources to understand and mitigate greenhouse gas emissions in their operations, facilities, and supply chain.

INTEGRITY AND COMPLIANCE

Anti-Corruption:

The Company has zero tolerance for bribery and corruption; therefore, all Suppliers are required to comply with the anti-corruption laws, directives, and regulations that govern operations in the countries in which they do business either directly or indirectly, including, without limitation, the U.S. Foreign Corrupt Practices Act. Similarly, Suppliers are prohibited from promising, offering, making, authorizing, or enabling any third party to offer or make on the Supplier's behalf, any improper payments of money or any item of value to government officials, political parties, or candidates for public office. Facilitating payments intended to expedite or ensure performance of routine governmental actions is also prohibited, regardless of whether they are permitted under local law. Suppliers are expected to implement the necessary controls, and conduct appropriate due diligence, to prevent and detect corruption in its business arrangements and contracts.

Providing Gifts and Gratuities

Business courtesies such as gifts, entertainment, services, or favors should not be offered to any Government employee or representative. When dealing with non-Government personnel in connection

with Government contracts or subcontracts, similar restrictions apply. It is a crime to offer, provide, solicit, or accept anything of value either in return for favorable consideration on a Government contract or subcontract, or because of an official act performed or to be performed. Business courtesies offered to commercial, non-Government customers must demonstrate good business judgment, must be consistent with marketplace practices, infrequent, nominal in amount (e.g., less than \$100) and legal, and must not be in cash or offered in a manner that could hurt the Company's reputation for impartiality and fair dealing. At Obsidian, we compete on the merits of our services and do not use the exchange of gifts and business courtesies to gain an unfair competitive advantage. We expect our Suppliers to do the same.

Fair Competition

Integrity and fair dealing are core components of the Company's business practices. All vendors, suppliers, and other business partners should be treated fairly and uniformly in accordance with the Company's established purchasing policies and procedures. Suppliers must not engage in any activity prohibited under anti-trust laws, including boycotting, price fixing, refusal to deal, price discrimination, or disparate treatment of suppliers. Paying bribes, accepting kickbacks, and obtaining and using third-party insider information in dealings with suppliers, vendors, and business partners are expressly prohibited and will not be tolerated. Suppliers are required to comply with all applicable anti-trust or competition laws and regulations. Similarly, the Supplier must not share with Obsidian the Protected Information of its competitors except as authorized by the owner of the information.

Insider Trading

Our Suppliers who possess material, non-public information concerning Company business or that of Company suppliers or partners may not trade in the Company's securities or those of such Suppliers, or reveal the information to anyone. Suppliers are expected to have implemented processes to prevent their employees from trading in securities or the securities of any other company while in possession of material non-public information.

Conflict of Interest

Each Supplier has the legal duty to carry out its responsibilities with the utmost good faith and loyalty to the Company. Suppliers are expected to avoid all actual or apparent conflicts of interest in their dealings with Obsidian. It is the responsibility of each Supplier to recognize and report to Obsidian any activities or relationships that might create an organizational conflict of interest so that the Company can take appropriate actions to avoid any such organizational conflict.

False Claims/False Statements

Knowingly making a false claim or false statement to the Government is a violation of law and can subject both the Company and the Supplier to civil and criminal sanctions, including but not limited to fines, suspension, debarment, and/or prison sentences. Each Supplier is responsible for ensuring that all claims and statements submitted to the Government are truthful and not misleading.

Personally Identifiable Information (PII), Confidential, Proprietary, and Intellectual Information/Property

Suppliers are required to comply with applicable data privacy laws. To this end, it is expected that Suppliers shall properly handle, store, and protect sensitive information, including confidential, proprietary, or personal information. Suppliers must comply with all laws governing the use, disclosure,

and protection of intellectual property, including patents, copyrights, trademarks, and service marks. Suppliers must also cooperate with all Obsidian compliance efforts.

The Company and Suppliers will ensure compliance with Defense FAR Supplement (DFARS) Clause 252.204-7012: “Safeguarding Covered Defense Information” and other similar civilian agency information safeguarding regulations where applicable.

Records

Suppliers will create and maintain complete and accurate records. Suppliers should not alter any records to conceal or misrepresent the underlying transaction. Suppliers must also comply with the applicable retention requirements in the FAR or any relevant and applicable National Archives and Records Administration requirements.

Import/Export

Suppliers shall comply with all applicable laws and regulations governing international trade. Prior to transferring any item inside/outside of the United States or to a foreign company or national within the United States, it is the responsibility of each Supplier to ensure that all laws, regulations, and directives governing the import or export of parts, components, technical data, and defense items or services are followed. This responsibility includes verifying that the correct license is used on any export declaration or other document required for export.

Restrictive Trade/Boycotts

Suppliers must not participate in, cooperate with, submit to, or otherwise further the cause of any unsanctioned boycott or restrictive trade practice.

Prohibited Technology

Suppliers must not provide to Obsidian, either directly or embedded in other products, any “covered telecommunications equipment or services” as defined in FAR 52.204-25. Our Suppliers are required to notify Obsidian in the event they become aware that they have provided covered telecommunications equipment and must cooperate with Obsidian to address the matter.

Counterfeit Electronic Parts

Suppliers must comply with DFARS 252.246-7007 when performing under a Government contract. Suppliers shall develop, implement, and maintain policies, procedures, and methods to detect and avoid counterfeit electronic parts. Suppliers are required to promptly notify Obsidian upon detection of counterfeit parts.

Compliance

It is the Company's policy that there will be no retaliation against any employees who report to the Company or to any Government official what they believe in good faith to be a violation of this Code or of any law or regulation applicable to the Company, or who assist others in making any such report. We expect our Suppliers to have effective systems in place to comply with the laws, regulations, and standards set forth in this Code, and to cooperate fully with the investigation of any violation. Where applicable, we expect our Suppliers to comply with the Contractor Code of Business Ethics and Conduct (FAR 52.203-13). Each Supplier shall ensure that all suppliers, subcontractors, and agents it uses to fulfill obligations or commitments to Obsidian comply with the Code or impose substantially similar obligations.

Audit and Enforcement

Suppliers are expected to implement and maintain measures to audit their compliance with these standards and to take appropriate corporate or personnel action to correct identified deficiencies.

Code Violations

Obsidian reserves the right to pursue corrective action to remedy any violation of this Code. In the case of a violation of law or regulation, the Company may be required to report such violations to the proper authorities. While the Company representative receiving a report of a suspected violation will take steps to keep such a report confidential, the need to investigate and correct any impropriety may require disclosure of the matter reported. We reserve the right to terminate our relationship with any Supplier under the terms of the existing applicable Agreement.

Substance Abuse

Suppliers shall have policies and procedures in place to ensure that employees do not conduct work while under the influence of alcohol, illegal drugs, or misused medications (whether prescription or non-prescription). Suppliers shall also put in place policies and procedures that prohibit employees from using, possessing, transferring, or selling illegal drugs or alcohol or misused medication (whether prescription or non-prescription) while at work or while on the job.

Quality

Suppliers shall take due care to ensure their work product meets applicable quality standards. Suppliers shall put in place quality assurance processes to identify defects and implement corrective actions, and to facilitate delivery of a product whose quality meets or exceeds the contract requirements. Suppliers shall develop, implement, and maintain methods and processes appropriate to their products to minimize the risk of introducing counterfeit parts and materials into deliverable products. Effective processes should be in place to detect counterfeit parts and materials, provide notification to recipients of counterfeit product(s) when warranted, and exclude counterfeit parts from delivered product.

MANAGEMENT SYSTEM

Suppliers shall adopt and implement a management system to comply with the principles set forth in this Supplier Code. Management Systems will vary from Supplier to Supplier based upon the size and scope of the business and risks. The management system will be designed to ensure (a) compliance with applicable laws, regulations, and customer requirements; (b) conformance with this Supplier Code; (c) mitigation of risks, and (d) a process to track, measure, and drive improvements in the management system. The management system should contain at a minimum the following elements:

- **Company Commitment and Management Accountability** through policy statements affirming the supplier's commitment to compliance and identifying a company representative[s] responsible for ensuring implementation of the management systems.
- **Risk Assessment and Risk Management** process including diligence and monitoring requirements to identify risks associated with the supplier's operations and third-party engagements. As regulations continue to change and emerge, the supplier's management system should include a process to monitor and track regulatory activity that may impact its business and that of its customers and suppliers relating to, but not limited to, environmental, restricted material usage, conflict minerals, hazardous waste, and trade restrictions.

- **Training Programs** for training managers and workers to implement the supplier’s policies, procedures, and improvement objectives and to meet applicable legal and regulatory requirements.
- **Standards, Audits and Assessments** to ensure conformity to legal and regulatory requirements, the content of the Supplier Code, and customer contractual requirements.
- **Corrective Action Process** for timely correction of deficiencies identified by internal or external assessments, inspections, investigations, and reviews.
- **Documentation and Records** to ensure compliance with the principles of this Supplier Code.
- **A Process to Communicate Supplier Code Requirements to Suppliers** and monitor supplier compliance with the Supplier Code of Conduct.

REPORTING CONCERNS

If you become aware of a situation that may involve a violation of this Supplier Code, you have a responsibility to report it. Please note that failure to comply with this Supplier Code may result in termination as an Obsidian supplier and possible legal action.

Obsidian employees and subcontractors can report actual or suspected violations of Obsidian policies on an anonymous basis via the web at OSGHOTLINE@OBSIDIANS.G.US. Obsidian will treat all reports confidentially to the extent possible, consistent with the law, Company policy, and the Company’s need to conduct a thorough investigation. All reports will be investigated promptly and thoroughly, consistent with applicable law, and upon the advice and approval of Obsidian’s legal counsel, may be reported to the appropriate authorities.