CODE OF CONDUCT

VERSION 4 | OCTOBER 2026

GO TOWARDS TOMORROW **go V2X**

Contents

Leadership Letter

- Letter from our CEO

Integrity & Ethics

- Scope & Application of this code
- Employee Responsibilities
- Violations of Employee Responsibilities
- Compliance with Policies, Laws, & Regulations
- Supervisor & Manager Responsibilities
- Making Ethical Decisions
- Asking Questions & Raising Concerns
- Concern Resolution Process
- Complaint Resolution Expectations
- Zero Tolerance of Retaliation
- Cooperating with Inquiries & Investigations

Mutual Respect

- Diversity & Non-Discrimination
- Safe & Healthy Workplace
- Drugs & Alcohol
- Workplace Violence
- Environmental Stewardship
- Human Rights
- Privacy of Employee Information

Corporate Citizenship

- Fair & Open Competition
- Zero Tolerance for Corruption & Bribery
- Anti-Money Laundering
- Business Courtesies
- Government Officials
- Commercial Third Parties
- Export & Import Controls
- Political Involvement

Partnership Integrity

- Honest & Ethical Dealings
- Procurement Integrity
- Organizations Conflicts of Interest (OCI)
- Business Partner Relations
- Subcontractor Code of Ethics Provisions
- Product Origin, Quality, & Substitution
- Conflicts of Interest
- Outside Employment
- Artificial Intelligence (AI)

Financial Integrity

- Accuracy of Records
- Company Assets
- Sensitive Information
- Customer Confidential Information
- Insider Training

Public Communications

- Social Media

Contact Us

Appendix

Leadership Letter



"Our Code of Conduct is more than a set of rules—it is a reflection of who we are at V2X. Integrity, respect, responsibility, and professionalism define our culture and guide every decision we make. By upholding these principles, we reinforce our reputation as a trusted mission provider and ensure our continued success. I encourage each of you to embrace this Code, not just as a requirement, but as a commitment to excellence in everything we do."

JEREMY C. WENSINGER
President and CEO

Letter from our President and Chief Executive Officer

Welcome to V2X. I am delighted to introduce our Code of Conduct. This document is more than just a set of guidelines—it is a testament to our commitment to integrity and ethical behavior in all aspects of our work. Upholding the highest ethical standards is of utmost importance as we strive to be our customers' preferred mission provider. Our commitment to these standards is not just an expectation from our customers but a fundamental principle we must uphold within ourselves.

At V2X, our reputation as a trusted mission provider is built on the foundation of our core values:
Integrity, Respect, Responsibility, and Professionalism.

These values guide our actions and decisions, ensuring that we consistently deliver exceptional service to our customers and maintain the trust of our stakeholders.

The Code of Conduct outlines the standards and expectations for ethical behavior that each of us must uphold. It serves as a vital framework for our operations, helping us navigate complex situations and make decisions that align with our values. By adhering to this Code, we demonstrate our commitment to ethical conduct, fostering a culture of trust and accountability within our organization.

It is essential that every V2X employee reads, understands, and abides by our Code of Conduct. Our collective adherence to these principles ensures that we maintain the highest standards of integrity and professionalism in our interactions with colleagues, customers, suppliers, partners, and communities.

Thank you for upholding these values. Together, we will continue to build a company that stands for excellence, trust, and ethical conduct.



JEREMY C. WENSINGER
President and CEO

INTEGRITY & ETHICS

INTEGRITY & ETHICS

Our values of integrity, respect, responsibility, and professionalism are the foundation for the way we do business, and our success depends upon our unwavering commitment to conducting business ethically and in compliance with all applicable laws and regulations. As part of this commitment, we are all expected to comply with the words and spirit of this Code of Conduct ("Code").

SCOPE AND APPLICATION OF THIS CODE

This Code, and the standards of business conduct and ethics incorporated in the Code, apply to all employees, officers, and directors of V2X. Certain business partners and third parties, such as suppliers, agents, representatives, contractors, subcontractors, and consultants, serve as an extension of V2X and, as such, are expected to conduct themselves according to our values and standard of ethics when working on behalf of V2X. Any waivers to this code may be granted only by the Board of Directors and will be publicly disclosed as required by law or regulation.



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

VIOLATIONS OF EMPLOYEE RESPONSIBILITIES

Violations of the Code, company policies, or laws and regulations will not be tolerated and may result in disciplinary action up to and including termination, legal proceedings and penalties including, in some circumstances, civil or criminal prosecution for both the individual involved and V2X.

COMPLIANCE WITH POLICIES, LAWS, & REGULATIONS

As a V2X employee, you are expected to know and understand the laws, regulations, and company policies that apply to your duties. Regardless of your nationality or country location, you are responsible for complying with all 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 because local business and cultural practices may vary. While we respect the norms of our customers and colleagues throughout the world, we must comply with applicable laws and regulations. If you have questions, or if a conflict appears to exist between requirements, stop what you are doing and seek guidance from your supervisor or others listed in this Code.



SUPERVISOR & MANAGER RESPONSIBILITIES

Leaders, 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 that 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.*
- *Report any incidents of discrimination or harassment brought to your attention.*

MAKING ETHICAL DECISIONS

We all take pride in our work and in the choices we make on behalf of V2X. 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:

- *Am I adhering to the letter and spirit of our company's policies and to all applicable laws and regulations?*
- *Is my action consistent with company values and the principles set forth in our Code?*
- *Would I be acting in the best interests of V2X, my coworkers, and our customers?*
- *What would my family, friends, or neighbors think of my action?*
- *Would I want my action reported on the front page of a newspaper or on the Internet?*
- *If you are unsure as to what action is appropriate, seek guidance by speaking with your supervisor or with any of the other resources listed in this Code.*



ASKING QUESTIONS & RAISING CONCERNS

Our Standard: If you observe or suspect any illegal or unethical behavior, you are expected to raise the issue to your management or to one of the other resources listed below. In most cases, you should first contact your supervisor to raise your concerns. However, if you are uncomfortable talking to your supervisor, contact Human Resources, Legal Department, or a member of the Corporate Ethics team. You also have the option to report concerns using the EthicsPoint Hotline by telephone or through the Internet.

INTERNAL AUDIT MATTERS & WHISTLEBLOWER PROTECTIONS

Concerns about accounting, internal controls or auditing matters and confidential or anonymous submission of questionable accounting, internal controls, or auditing matters may be transmitted to the Audit Committee of the Board of Directors. To raise a concern directly to the Audit Committee, contact EthicsPoint or the Ethics and Compliance Office at Ethics@gov2x.com and the concern will be communicated to the Chair of the Audit Committee of the Board.

V2X is committed to enforcing the protections of whistleblowers mandated under the Defend Trade Secrets Act. More information on the V2X Defend Trade Secrets Act policy may be found on V2X VExM, specifically 1.10.9 Whistleblower Protections in the Defend Trade Secrets Act.

In addition, employees may use the Department of Defense Inspector General (DOD IG) Hotline to report issues related to fraud, waste, abuse, and mismanagement for programs and personnel under the purview of the U.S. Department of Defense.

CONCERN RESOLUTION PROCESS

The recommended sequence of steps for resolving employee issues is shown here.

This chain of command approach will greatly improve the response time to address your concerns.



Start by contacting your direct supervisor or their supervisor. If your concern involves either of them, move to the next action.

ACTION 1

IF YOU DO NOT FEEL COMFORTABLE WITH A PARTICULAR ACTION, SKIP TO THE NEXT ACTION.



Contact your local HR, Site, Country, or Program Manager

ACTION 2



Contact Corporate Ethics at ethics@gov2x.com

ACTION 3

Contact the EthicsPoint Website*

or call 866.294.8691 or 503.748.0662

(collect calls are accepted)

ACTION 4

**Your complaint can be submitted anonymously using this action.*

COMPLAINT RESOLUTION EXPECTATIONS

Our Standard: The EthicsPoint Hotline and website are always available, and all reports of violations will be investigated thoroughly and confidentially. The EthicsPoint Hotline is available 24 hours a day, seven days a week. This independent third-party provider facilitates the documentation of your concerns and forwards them to the appropriate compliance contact within V2X to address.

When making a report, you are encouraged to identify yourself. Doing so facilitates communication and helps V2X 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 EthicsPoint Hotline, 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 investigated thoroughly, and, if appropriate, corrective actions are implemented.

ZERO TOLERANCE OF RETALIATION

Our Standard: There is zero tolerance of retaliation for those employees who, in good faith, report possible ethics or compliance violations. You can report suspected ethics violations in confidence and without fear of retaliation. V2X 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 reported immediately.

V2X is prohibited by law from discharging, demoting, or otherwise discriminating against employees as a reprisal (collectively referred to as retaliation) for their disclosing of information, either to internal management or to various government agency officials, involving potential evidence of substantial fraud, waste, mismanagement, abuse of authority, threats to homeland security, specific danger to public health or safety, or violation of law related to the performance of U.S. Government contracts.

Depending on the facts, it could be retaliation if an employer acts because of the protected activity to:

- Reprimand the employee or give a performance evaluation that is lower than it should be.
- Transfer the employee to a less desirable position.
- Engage in verbal or physical abuse.
- Threaten to make, or actually make reports to authorities (such as reporting immigration status or contacting the police).
- Increase scrutiny.
- Spread false rumors, treat a family member negatively (for example, cancel a contract with the person's spouse).
- Make the person's work more difficult (for example, punishing an employee for a complaint by purposefully changing his/her work schedule to conflict with family responsibilities).

Any V2X employee who believes that he/she has been retaliated against for making a disclosure is encouraged to report the matter to any Human Resources or Legal representative, compliance professional, or EthicsPoint Hotline. You may also file a complaint with the DODIG or the IG of the applicable governmental agency.

COOPERATING WITH INQUIRIES AND INVESTIGATIONS

Our Standard: Cooperate with all internal and external inquiries and investigations. You are expected to cooperate fully with internal and external audits, investigations, and inquiries that are conducted by the company. 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. Although we are expected to cooperate fully, if you learn of a potential government investigation or inquiry, immediately notify your supervisor and the Legal Department, if possible, prior to taking or promising any action.

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

- Destroy, alter, or conceal any document in anticipation of or in response to a request for these documents.
- Provide or attempt to influence others to provide incomplete, false, or misleading statements to a company or government investigator.
- Conduct an investigation yourself; appropriate resources will be assigned to conduct the investigation.

MUTUAL RESPECT



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.

DIVERSITY AND NON-DISCRIMINATION

Our Standard: 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. Combining such a wealth of talent and resources creates the dynamic teams that consistently drive outstanding results.

We do not tolerate unlawful 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, 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, or touching, or displaying sexually explicit or offensive pictures. Promises of promotion or special treatment in return for sexual favors also constitute harassment.

MAKE SURE YOU:

- Treat others respectfully and professionally.
- Avoid making comments or jokes, or sending or posting materials that others might consider offensive.
- Avoid discrimination against others.
- Review your own decisions to ensure that you are using objective and quantifiable standards and business considerations to drive your actions.
- Report all incidents of discrimination, harassment, and intimidation that you observe.
- Managers have an obligation to report any incidents of discrimination or harassment brought to your attention.

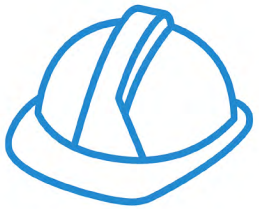
SAFE AND HEALTHY WORKPLACE

Our Standard: Maintain a safe, healthy, and secure work environment.

V2X 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. V2X requires that all employees practice safe work habits and follow all applicable safety, security, and health rules and practices.

MAKE SURE YOU:

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



DRUGS AND ALCOHOL

VExM Reference Document: 4.6.14 Drug and Alcohol-Free Workplace

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 V2X premises, on company time, or when conducting or traveling on company business is prohibited.

The use of controlled substances is also prohibited on any company premises—whether leased, owned, or provided by a customer—or during working hours.

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.

WORKPLACE VIOLENCE

VExM Reference Document: 1.4.10 Workplace Violence Prevention Plan

Violence of any kind has no place at V2X. We will not tolerate any acts or threats of physical violence against coworkers, visitors or anyone on V2X property, or by any representatives of V2X during company travel or company-sponsored events.

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 weapons and other items, such as explosives or fireworks into company facilities or to company-sponsored events.

Employees must immediately report any observations of violence to their supervisor, any member of management, Human Resources, Corporate Ethics, Safety or Security.



ENVIRONMENTAL STEWARDSHIP

VExM Reference Document: 4.7 EHS Policy, Principles & Practices

Our Standard: 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, and company policies, and to continuously improving our environmental performance through resource conservation, waste minimization, water and energy efficiency, and the effective use of raw materials.

MAKE SURE YOU:

- Comply with all applicable environmental laws, regulations, and company policies.
- Report any incident or conditions 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.

HUMAN RIGHTS

VExM Reference Document: 1.7 Combatting Trafficking in Persons

Our Standard: 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, and are committed to providing safe and secure conditions for those working on our company's behalf.

We will not knowingly work with commercial business partners that 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 and Federal Law 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.

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.
- Commit to obeying the associated laws, regulations, and where these laws vary or conflict, follow the highest standards.



PRIVACY OF EMPLOYEE INFORMATION

VExM Reference Document: 4.6.9 Access to Personnel Records and Files

Our Standard: 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 were permitted by law.

MAKE SURE YOU:

- If you have access to employee information, 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.



CORPORATE CITIZENSHIP

FAIR AND OPEN COMPETITION

VExM Reference Document: 1.10c.2 Compliance with Antitrust Laws

Our Standard: Recognize and avoid anti-competitive behaviors and activities.

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 and 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.

Anti-trust laws are complex, and compliance requirements can vary depending on the circumstance, but, in general, the following activities are "red flags" and should be avoided and reported to your supervisor or the Legal Department:

COLLUSION

When two or more parties secretly communicate or agree on how they will compete. This could include agreements or exchanges of information on pricing, terms, wages, or allocations of markets.

BID-RIGGING

When two or more parties manipulate bidding so that fair competition is limited. This may include comparing bids, agreeing to refrain from bidding, or knowingly submitting noncompetitive bids.

TYING

When a company with market power forces customers to take products or services that they do not want or need.

PREDATORY PRICING

When a company with market power sells a product or service below cost so as to eliminate or harm a competitor, intending to recover the loss of revenue later by raising prices after the competitor has been eliminated or harmed.

Make sure you:

- Never share the company'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 or disseminate non-public information about potential competitors from new hires or candidates for employment.
- Never have conversations with potential competitors that could be perceived as limiting competition.



ZERO TOLERANCE FOR CORRUPTION & BRIBERY

VExM Reference Document: 1.10d.1 Anti-Bribery and Corruption Procedure

Our Standard: V2X has zero tolerance for acts of bribery and corruption. Do not offer or provide bribes to influence action or accept kickbacks in connection with company business.

V2X 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 V2X, regardless of whether we are dealing with a government or commercial customer.

The U.S. Foreign Corrupt Practices Act (FCPA), the United Kingdom Bribery Act, and the laws of most countries in which we operate all prohibit bribing government officials. For purposes of these laws, the term "government official" is defined broadly and includes civil servants, officials of state-owned or controlled commercial enterprises, representatives of public international organizations, office seekers, political parties, family members, and political party officials. Many countries also have laws that prohibit bribes paid to private individuals.

It is especially important that employees carefully monitor third parties acting on thecompany's behalf. We must always be sure to perform due diligence and know our business partners and all those through whom we conduct our business.

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 by company policy and are a violation of some international norms and national laws, such as the U.K. Bribery Act. You must obtain approval from the Legal Department before making a facilitating payment no matter how small the amount. If you are solicited for a facilitation or expediting payment, contact the Legal Department immediately.

A facilitating payment can be made if an individual's health or safety is being imminently threatened and there is no practical opportunity to secure advance authorization from the Legal Department. The payment must be reported to the Legal Department as soon as possible.

Examples of facilitating payments are offering small fees to low-level foreign government officials to expedite processing of a permit, license, or other official document, processing visas or work orders, or providing phone, water, and power service.

A **BRIBE** is the payment of anything of value, such as cash, gifts, services, contributions, internships, or vacations made for the purpose of improperly obtaining or retaining business.

A **KICKBACK** is the return of a sum already paid or due to be paid, as a part of a legal contract, as a reward for making or fostering business arrangements.

FACILITATION OR EXPEDITING PAYMENTS
Sometimes known as "grease payments," facilitation or expediting payments are modest amounts of money paid as an unofficial fee to low-level government employees to expedite or initiate the performance of routine and expected government services to which V2X is entitled.

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.
- Never directly or indirectly request, agree to receive, or accept kickbacks, payoffs, or other personal payments in connection with company business.
- Notify the Legal Department of third parties or agents who are thought to be valuable primarily for their personal ties rather than for the services they are to perform or who request compensation out of proportion to their services.

ANTI-MONEY LAUNDERING

V2X does not condone, facilitate, or support money laundering. Involvement in such activities undermines our integrity, damages our reputation, and can expose V2X and individuals to severe sanctions.

Employees must comply with all applicable anti-money laundering and anti-terrorism requirements that prohibit:

- Engaging in financial transactions involving property, funds, or monetary instruments that, directly or indirectly, promote or result from criminal activity.
- Receiving, transferring, transporting, retaining, using, structuring, diverting, or hiding the proceeds of any criminal activity, or aiding or abetting another in any such action.
- Engaging or becoming involved in financing, supporting, or otherwise sponsoring, facilitating, or assisting any terrorist person, activity, or organization.

MAKE SURE YOU:

- Never cooperate with efforts to evade reporting requirements.
- Report suspicious activity, such as payments to offshore banking locations, payments to third parties outside the territory in which the third party operates, and false invoices for sales.

MONEY LAUNDERING occurs when companies or individuals attempt to convert, disguise, or hide proceeds of illegal activity by moving illegally obtained funds, or by hiding the source sothe funds are made to appear legitimate.

BUSINESS COURTESIES

VExM Reference Document: 1.7.5 Business Courtesies, Donations, Entertainment, and Gifts

Our Standard: Do not accept or provide business courtesies if the intent is to improperly influence a business decision.

Conducting business with integrity means never seeking to improperly influence business decisions. For this reason, it is important for each of us to exercise common sense and good judgment when giving or receiving business courtesies. Before giving or receiving a business courtesy you must review the V2X policy on business courtesies and use the Business Courtesy Request System as required by policy.

In general, we may not offer or accept a business courtesy if it:

- Violates any law, regulation, or policy applicable to the giver or recipient.
- May be considered a bribe, payoff, or kickback.
- Violates customary business practices.
- Gives the appearance of impropriety or could give rise to a conflict of interest.

A **BUSINESS COURTESY** is any item of value provided to or received from a third party for the purpose of initiating or furthering a business relationship. Business courtesies include such things as cash, entertainment, meals, gifts, social events, sporting events, travel, lodging, favors, gratuities, discounts, and services.

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. If you have concerns related to business courtesies, contact the Legal Department.

GOVERNMENT OFFICIALS

VExM Reference Document: 1.7.5 Business Courtesies, Donations, Entertainment, and Gifts

U.S. Government Officials

The U.S. Government has strict laws and rules prohibiting its employees or elected representatives from accepting business courtesies. With the exception of common hospitality and promotional items of nominal intrinsic value, we may not offer or give a business courtesy to a government official without the prior written approval of the Legal Department.

Non-U.S. Government Officials

Most countries prohibit their official employees from accepting business courtesies. With limited exceptions, business courtesies extended to any government officials require prior written approval from the Legal Department.

MAKE SURE YOU:

- Coordinate with the Legal Department for review and approval prior to providing any business courtesy to any government official no matter the country they represent.
- Are aware of the perceptions that can be drawn from the provision of business courtesies to government employees.
- Exercise caution when dealing with business partners, which could appear to be privately owned are actually considered government entities.



COMMERCIAL THIRD PARTIES

VExM Reference Document: 1.7.5 Business Courtesies, Donations, Entertainment, and Gifts

Exchanging business courtesies with our commercial third parties must be reasonable, infrequent, for a legitimate business reason, and consistent with normal industry practice and local laws.

Providing or offering business courtesies to commercial third parties that exceed nominal value may require written Legal Department approval. Before giving or receiving a business courtesy from a commercial third party you must review the V2X policy on business courtesies and use the Business Courtesy Request System as required by the policy.

Exceptions include coffee, soft drinks, light snacks, an inexpensive business-related meal incident to a site visit, recognition awards for program or service achievements, or promotional items.

Make sure you:

- Seek guidance and approval if you are unsure as to whether the business courtesy is appropriate.
- Only provide and accept business courtesies that are justified by the business relationships. Keep in mind that exchanging business courtesies that foster goodwill in business relationships is generally acceptable, but you should never provide or accept business courtesies that obligate or appear to obligate the recipient.
- Do not offer or accept lavish, extravagant, or unreasonable business courtesies.
- Do not offer travel and lodging without advance approval from your Legal Department.
- Understand and comply with both V2X and third-party policies before offering or providing business courtesies.
- Raise a concern whenever you suspect that a colleague, third party, or other agent of the company may be engaged in an attempt to improperly influence a decision of a customer.

SPECIFICALLY, REGARDING THE ACCEPTANCE OF BUSINESS COURTESIES:

- Do not request or solicit personal gifts, favors, entertainment, services, or any other type of business courtesy.
- Never accept cash or cash equivalents, such as gift cards, of any value.
- Never accept business courtesies of any kind from a business partner with whom you are involved in contract negotiations.
- Refuse business courtesies that seem inconsistent with our business practices and report it to your supervisor.
- Seek advance written approval for any exceptions.

EXPORT AND IMPORT CONTROLS

VExM Reference Document: 1.6.7 Import Compliance

Our Standard: Fully comply with export/import laws and do not trade with sanctioned or embargoed countries or entities.

In the U.S. as well as other countries in which V2X 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. V2X complies with all trade restrictions and import and export control laws of the United States and all other countries in which we operate. We expect all of our business partners, third parties, consultants, and contractors to do the same. Limited exceptions may apply in cases where such laws conflict with U.S. laws.

Export rules may restrict the following:

- *Any oral discussion with any non-U.S. person, even someone inside the U.S., if it includes technical information about defense articles.*
- *Using business knowledge outside of the employee's country, such as when providing technical assistance such as maintenance training to foreign persons.*
- *Transfer of technical data to someone in another country, such as through the Internet, e-mail, conversations, meetings, and network or database access may be restricted. This restriction applies to sharing information with other company employees, as well as non- employees and non-US citizens inside or outside the United States.*
- *Transferring technology from an authorized non-U.S. person to one that is not authorized.*
- *Transporting, carrying, or sending a controlled defense article or technical data about a defense article outside the U.S.*

An **EXPORT** occurs when a product, service, or technology is transferred either physically across borders; electronically via the Internet, fax, e-mail, or data-sharing sites; or visually through demonstrations, presentations, and discussions between nationals of different countries. Such exports, if they involve controlled military or dual-use technologies, often require government approval in the form of an export license or other authorization.

An **IMPORT** occurs when products purchased or obtained from a foreign country or external source are brought into another country. Import transactions are subject to laws and regulations and must go through Customs' formalities for the assessment of necessary duties and taxes.

Additionally, there are 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.

To avoid problems, employees must consult Trade Compliance or the Legal Department as early as possible about local laws on exporting products, information, and technology.

- *Comply with all export and import laws, regulations, and requirements and with V2X trade- control policies.*
- *Understand the trade controls related to V2X products, technology, and information and the restrictions on transferring those items to entities outside the company.*
  - *Obtain licenses or other government approvals prior to exporting and importing products and technology controlled by the Government.*
  - *Report any known or suspected trade-control violation to the V2X Trade Compliance Department.*
- *Report complete, accurate, and detailed information regarding every imported product, including its proper classification, country of origin, and appropriate value.*



We may not participate in or promote boycotts that the U.S. does not support, such as the Arab League Boycott of Israel.

If you are involved in any actions that relate to either Exports or Imports, please ensure you review the relevant V2X procedures in VExM 1.6 Trade Compliance and reach out to the Legal Department for assistance in obtaining appropriate licenses or any other documentation required. To avoid problems and/or delays, or to report possible violations, contact the Legal Department as early as possible about local laws on exporting products, information, and technology.

Make sure you:

- Review all transactional documents, including contracts, letters of credit, shipping or import documents, or bid and proposal materials, for any language that may constitute a boycott request.
- Notify the Trade Compliance Department or Legal Department if requested to join in, support, or furnish information concerning a non-U.S. boycott.

BOYCOTTS occur when person, group, or country refuses to do business with certain persons, groups, or countries as a means of protest, an expression of disfavor, or a method of coercion.



POLITICAL INVOLVEMENT

Our Standard: Do not support political parties on the company's behalf or engage in prohibited lobbying activities. We believe that our employees benefit from being active in the community through good citizenship. We recognize that our employees have a right to voluntarily participate in the political process, including volunteering in campaigns and making individual political contributions.

V2X also has a clear and separate responsibility to obey all applicable laws and regulations with regard to operation of a corporate Political Action Committee and employing registered lobbyists for company business. These separate individual and company activities need not be in conflict provided that employees exercising their rights do so only in their own name and on their own time.

Never use the company name, funds, assets, services, or facilities to support any political candidate or party or to engage in any lobbying activity unless specifically permitted by law and authorized in advance by the Communications and Legal Departments.

MAKE SURE YOU:

- Consult with our Communications and Legal Department professionals BEFORE interacting with government officials in a manner that might be interpreted as a lobbying activity.
- Ensure that your personal political views and activities are not viewed as those of the company.
- Do not use the company's name, resources, or facilities to support your personal political activities.
- Never apply direct or indirect pressure on another employee, customer, or business partner to contribute to, support, or oppose any political candidate or party.
- Avoid the appearance that you are making political or charitable contributions in order to gain favor on behalf of V2X.
- Notify management prior to accepting or campaigning for political office.



PARTNERSHIP INTEGRITY

HONEST AND ETHICAL DEALINGS

Our Standard: Maintain a culture of integrity by being honest and ethical in business relationships.

We treat all of 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 the V2X Legal Department.

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's or third party's 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 and deliver on what you promise.



PROCUREMENT INTEGRITY

Our Standard: Understand and comply with the procurement integrity laws and regulations.

Since we conduct business with governments and government-owned entities, we are committed to compliance 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 Contracts or Legal Departments with questions specific to contracting with the government.

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 V2X. We must ensure that such employment discussions are approved in advance by company Human Resources and Legal Departments.

MAKE SURE YOU:

- Avoid seeking or receiving information that 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 the Legal Department if you inadvertently receive unauthorized bid or proposal or source-selection information.
- Comply with government conflict-of-interest restrictions.

BID OR PROPOSAL INFORMATION is typically proprietary information submitted by the bidding entity.

SOURCE SELECTION INFORMATION is any information prepared for use by a federal agency for evaluating bids or proposals to enter a procurement contract.

ORGANIZATIONAL CONFLICTS OF INTEREST (OCI)

Our Standard: Disclose any potential organizational conflicts of interest.

We are required to recognize and avoid organizational conflicts of interest in connection with direct or indirect contracts with the U.S. Government. 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 government.

BUSINESS PARTNER RELATIONS

Our Standard: 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. We expect business partners to follow terms and the spirit of our Supplier Code of Conduct, as well as any applicable contractual provisions, when working in connection with V2X.

SUPPLIER DIVERSITY

Recognizing the importance and benefits of a diverse supplier base, we will work to identify qualified minority- and woman-owned business enterprises, small business, other recognized disadvantaged businesses, 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, & SUBSTITUTION

Our customers, both government and commercial, have the right to insist on strict compliance with contract requirements. We must only deliver products and services 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.

CONFLICTS OF INTEREST

VExM Reference Document: 1.7.6 Conflicts of Interest

Our Standard: Disclose and seek guidance on any issues that 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 V2X. Each of us is expected to adhere to the V2X Conflicts of Interest Policy, 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 public place in us. Below are some areas in which potential conflicts of interest may arise.

PERSONAL RELATIONSHIPS

Personal relationships with employees or business partners, such as family members, friendships, and romantic partners, who have influence over one another through the chain of command, in purchasing or contracting decisions, in bidding or proposal-related efforts, or in recruiting or hiring decisions.

FINANCIAL DEALINGS AND INVESTMENTS

Situations where you or a family member has a significant financial ownership interest in a privately or publicly owned enterprise with which V2X competes or does business.





OUTSIDE EMPLOYMENT

Since outside employment may appear to bias our decisions against the best interest of V2X, we may not be employed by, work as a consultant for, or be affiliated with a V2X competitor, customer, or supplier. You should always discuss any outside work situations with your supervisor prior to undertaking them and disclose any additional employment to the EthicsPoint Helpline for review.

MAKE SURE YOU:

- Always make business decisions in the best interest of V2X.
- Seek guidance to avoid potential conflicts of interest.
- Disclose potential conflicts immediately by notifying your supervisor or Human Resources in writing.
- Notify your supervisor of any outside employment.
- Disclose any additional employment to the EthicsPoint Helpline for review.

BUSINESS INTELLIGENCE

Our Standard: Obtain competitive information only through proper means.

Information about competitors is a valuable asset in today's competitive business environment. When collecting business intelligence, V2X 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 V2X 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.

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 employers.
- 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 that you would not be willing to disclose fully.
- Do not disclose proprietary information belonging to your prior employer.
- Do not use for any other purpose proprietary information provided under a non-disclosure agreement for a particular purpose.

ARTIFICIAL INTELLIGENCE (AI)

VExM Reference Document: 5.2o Artificial Intelligence (AI) Policy

Our Standard: Use AI responsibly, lawfully, and with appropriate human oversight.

AI includes machine learning and generative AI tools that produce text, images, code, analysis, predictions, or recommendations, including AI features built into other software and AI agents that take actions on your behalf. V2X actively encourages the use of approved AI tools to improve productivity, support decision-making, and better serve our customers. AI also creates new risks. Inputs to AI tools may become training data, and outputs may be inaccurate, biased, or infringe on the rights of others. V2X develops, deploys, and uses AI in ways that are lawful, ethical, and safe, and that include human oversight appropriate to the task. AI does not replace human judgment. You remain fully accountable for any work product created with AI's help. Use only AI tools approved through the V2X AI Portal and follow the Enterprise Artificial Intelligence (AI) Policy (5.2o).



MAKE SURE YOU:

- Only use AI tools V2X has approved through the V2X AI Portal for the type of work and data involved. Never use consumer or free versions of AI tools for V2X work.
- Never enter classified information into an AI tool. Do not submit V2X proprietary, customer confidential, Controlled Unclassified Information, export-controlled (ITAR/EAR) data, personal information, trade secrets, or privileged legal information to an AI tool unless the tool has been specifically approved for that category of information.
- Review, verify, and take ownership of AI output before it is used, submitted, or delivered. Deliverables, records, and decisions affecting safety or employment require human review and sign-off. Follow customer and contract requirements on AI use, including any disclosure requirements.
- Do not use AI to create or circulate false, misleading, or deceptive content, including deepfakes, synthetic content that impersonates another person, or fabricated business records.
- Raise concerns about AI use that may be inconsistent with our values, our policies, or applicable law with your supervisor, the OCIO, Legal, Corporate Ethics, or the EthicsPoint Hotline.

FINANCIAL INTEGRITY

ACCURACY OF RECORDS

VExM Reference Document: 1.8.1 Records & Data Retention Directive

Our Standard: 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, 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.

RECORDS are any information generated during the course of company business and include not only paper documents, but also tapes, photographs, computer files, and records in any other form.

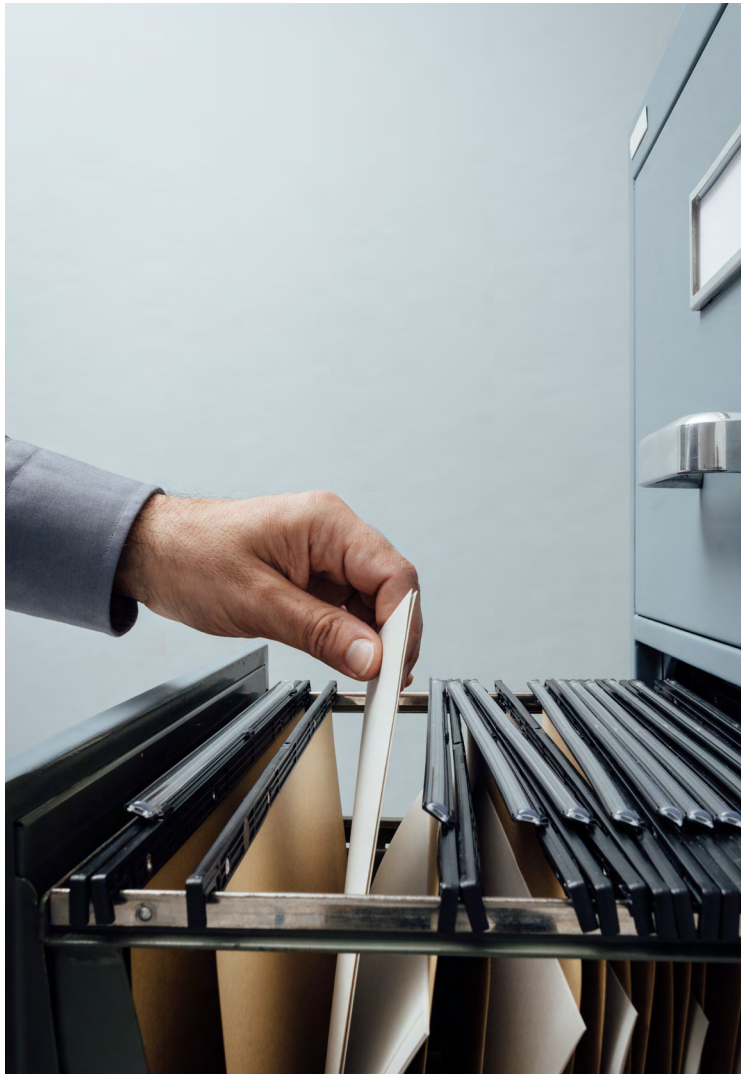
CHARGING COSTS

All costs allocated to a particular government contract as direct or indirect costs must be reasonable, allocable, and allowable under applicable procurement cost principles and Cost Accounting Standards in accordance with applicable Disclosure Statements.

In addition, when we work on government contracts or subcontracts, we must:

- Accurately record the number of hours worked to the appropriate project.
- Charge all labor and material costs to the proper contract and charge indirect costs properly.
- Ensure only costs properly chargeable to a government contract are billed to the government.





COMPANY ASSETS

Our Standard: 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 for 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.

COMPANY ASSETS include V2X products, funds, facilities, equipment, vehicles, information technology, intellectual property, proprietary and confidential information, as well as our company's reputation.

INFORMATION TECHNOLOGY

Information technology is a valued asset and is provided for the business use of our employees. We should use V2X information technology, such as Internet, e-mail, 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 V2X's 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 the information technology we use when working for V2X belongs to our company, you should not have an expectation that e-mails, Internet activity, computer files, and the like are private. V2X 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.

SENSITIVE INFORMATION

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

PROPRIETARY INFORMATION

VExM Reference Document: 1.10a Propriety Information

Company 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 company's proprietary information with anyone outside the company, even after your employment with V2X ends.



CUSTOMER CONFIDENTIAL INFORMATION

Our customers place their trust in us, and, in turn, we must protect their confidential information. We may only disclose customer-confidential information to coworkers who have a legitimate business need to know 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 or inadvertent disclosure of customer information.
- Take steps to ensure that customer information is secure when off company premises.
- Never use customer information for personal gain.



CLASSIFIED INFORMATION

In many situations, governments have entrusted special information to us that may be classified or require special handling. We have a continuing obligation to protect classified information. Security regulations that relate to the protection of government-classified information are complex and vary by country and government agency. 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 known or suspected security infraction or violation.
- Only give individuals access to classified information if it has been approved, they possess the necessary clearance level, and if they have a need to know.
- Promptly self-report to your security officer any issue requiring disclosure by the NISPOM and its categories of reportable information, any suspicious contacts, any attempts to compromise protected information, and or any other information required to be reported under applicable agency security program requirements.

INSIDER TRADING

VExM Reference Document: 1.10b Prohibition Against Insider Trade and Trading Windows Policy

During the course of our employment at V2X, we may come to know material information about our company or business partners before it is disclosed to the public. This information is often called “inside information,” and we are prohibited from trading securities or passing information on to others who then trade on the basis of this information.

MAKE SURE YOU:

- Do not buy or sell securities of our company when you have inside information.
- Do not communicate inside information on V2X to other people, including family members or friends.
- Never use or share material nonpublic information to participate in prediction markets, event contracts, betting, or similar activities involving V2X, our customers, business partners, or competitors. This applies whether you participate directly or through another person.

INSIDE INFORMATION is information that is confidential, material, not yet disclosed to the public, and that a reasonable investor would take into consideration when deciding whether to buy or sell a security.

Some examples of information about a company that might be considered “inside information” are:

- A proposed acquisition, merger, or sale
- A significant expansion or cutback of operations
- A significant product development effort
- Pending award of a substantial contract
- Changes in company’s senior management or executive structure
- Extraordinary management or business developments
- Sensitive corporate financial information

PUBLIC COMMUNICATIONS

PUBLIC COMMUNICATIONS

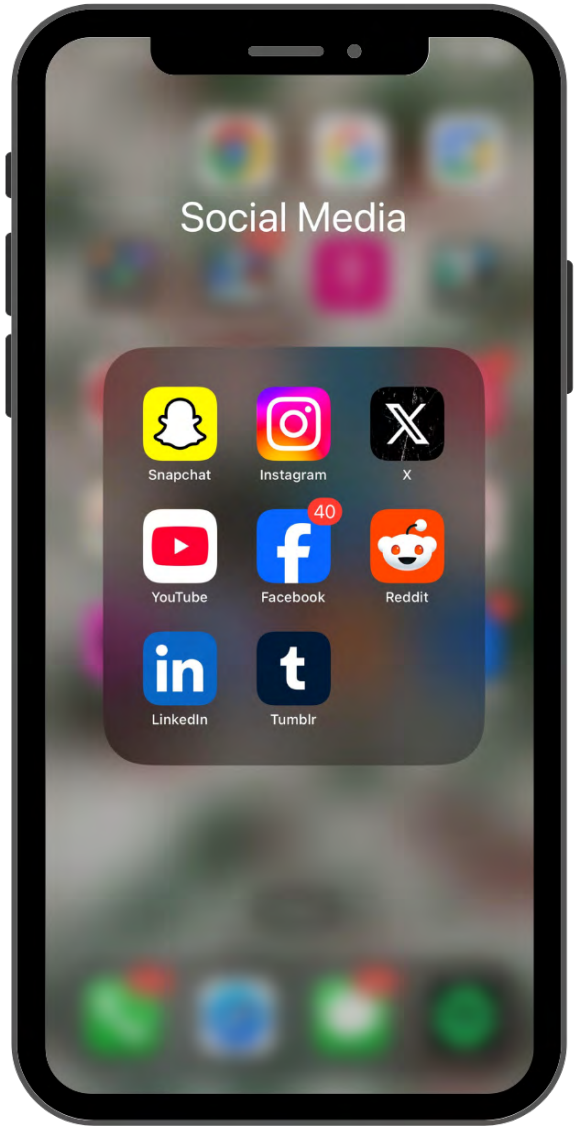
VExM Reference Document: 1.3 Marketing and Communications Policy

Our Standard: Only authorized persons may speak on behalf of the company.

We are committed to provide accurate and consistent information regarding our operations, products, and services to the public, and we must exhibit objectivity, openness, and honesty in our communications. As a publicly traded company, we are also subject to regulations that govern how we must disclose material financial information. To meet our standards, V2X needs a consistent voice when making disclosures or providing information. It is important that only authorized persons speak on behalf of the company.

MAKE SURE YOU:

- Never speak publicly on issues involving the company without prior authorization from a member of the Corporate Communications team.
- Obtain approval from the Communications team prior to making public speeches or writing articles for professional journals when you are identified as being an employee of the company.
- Obtain approval from the Communications team before distributing any communication intended for a broad employee audience.
- Never give the impression that you are speaking on behalf of the company in any personal communication, including user forums, biogs, chat rooms, and bulletin boards.



SOCIAL MEDIA

Our Standard: Use social media responsibly and in accordance with company values and policies.

Use social media responsibly, including on personal accounts. Protect confidential and proprietary information, respect others, and follow company policies concerning harassment, discrimination, and threats. Do not imply that V2X endorses your personal views or use company branding in a way that suggests authorization. A personal disclaimer does not excuse a violation of company policy. Nothing in this guidance restricts lawful discussion of wages, hours, or working conditions, or other legally protected activity.

You may be subject to disciplinary action, up to and including termination, for misuse of social media in violation of this Code or company 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.
- Never post material that is obscene, threatening, or abusive toward a coworker, consultant, contractor, customer, supplier, or competitor.
- If you ever have questions about what is or what is not appropriate, contact a member of the Communications team.

SUMMARY

The V2X Code of Conduct articulates for our employees, our customers, and other stakeholders the ethical standard that governs both our business conduct and our relationships with one another.

The Code is intended to help V2X employees understand and adhere to these standards in their daily activities, consistent with our core values of Integrity, Respect, Responsibility, and Professionalism, and is not intended to serve as a replacement for the laws, regulations, and internal policies that govern our operations.

CONTACT US

If you have questions or concerns and would like to speak with someone for advice on ethics or compliance matters, contact your local or Corporate Human Resources Department, Legal Department, or Corporate Ethics Department.

EthicsPoint Hotline
Phone: 866.294.8691 or 503.748.0662
Collect calls are accepted.

Web: https://secure.ethicspoint.com/domain/media/en/gui/40228/index.html

Concerns about accounting, internal controls or auditing matters and confidential or anonymous submission of questionable accounting, internal controls, or auditing matters may be transmitted to the Audit Committee of the Board of Directors. To raise a concern directly to the Audit Committee, contact EthicsPoint or the Ethics and Compliance Office at Ethics@gov2x.com and the concern will be communicated to the Chair of the Audit Committee of the Board.

V2X is committed to enforcing the protections of whistleblowers mandated under the Defend Trade Secrets Act. More information on the V2X Defend Trade Secrets Act policy may be found on the V2X VExM, specifically 1.10.9 Whistleblower Protections in the Defend Trade Secrets Act. In addition, employees may use the Department of Defense Inspector General (DOD IG} Hotline at www.dodig.mil/hotline/ hotlinecomplaint.html to report issues related to fraud, waste, abuse, and mismanagement for programs and personnel under the purview of the U.S. Department of Defense.

REFERENCES

This includes documents referenced within the procedure that are found in the V2X Execution Model (VExM) which houses all policies, procedures, forms and information documents.

Hyperlinks to the reference materials below are found in the appropriate section for immediate reference.

- 4.6.9 Access to Personnel Records and Files
- 4.6.14 Drug and Alcohol-Free Workplace
- 1.4.10 Workplace Violence Prevention Plan
- 4.7 EHS Policy, Principles & Practices
- 1.10d.1 Anti-Bribery and Corruption Procedure
- 1.7.5 Business Courtesies, Donations, Entertainment, and Gifts
- 1.7.6 Conflicts of Interest
- 1.10.9 Whistleblower Protections in the Defend Trade Secrets Act
- 1.10.6 Protecting Intellectual Property
- 1.8 Records & Data Retention Policy

REVISION HISTORY

- Rev00: V2X Code of Conduct original submittal 2022
- Rev01: V2X Code of Conduct Revised 2024
- Rev02: V2X Code of Conduct Revised 2026
- Rev03: V2X Code of Conduct Revised 2026
- Rev04: V2X Code of Conduct Revised 2026