



TELOS PARTNER CODE OF CONDUCT

At Telos Corporation (“Telos”), we believe it is essential to act ethically and in accordance with the laws and regulations of the countries in which we do business. We rely on our Partners to help us maintain the trust of our customers and the broader communities touched by our business dealings. Therefore, we only work with Partners who we believe are honest and ethical, and who commit to do business ethically.

The aim of this Partner Code of Conduct (the “Code”) is to jointly protect the value of our businesses and the strength of our collective reputations. This Code applies to all Telos business partners (i.e., supplier; distributor; reseller; service, channel, alliance or education partner, etc.) and their officers, directors, employees, independent contractors, and agents (“Partners”). We take ethics, integrity and compliance with laws seriously and expect all Partners to adhere to this Code when conducting business with Telos and its customers, potential customers and other Partners. Without limiting other rights and remedies that we may have under agreements with our Partners, if Telos believes that a Partner has failed or may fail to comply with this Code, Telos may immediately suspend or terminate its relationship with the Partner.

Compliance with Laws and Regulations Generally

Telos expects its Partners to stay abreast of and comply with all laws and regulations that apply to the conduct of their businesses and their relationships with Telos, including laws relating to anti-corruption, public procurement, antitrust and competition, export and import trade controls, employment, labor and working conditions, anti-human trafficking, anti-discrimination and harassment and retaliation, data privacy and protection, corporate governance, environmental protection, health and safety, and social matters.

Anti-Corruption Laws

Partners must comply with all applicable anti-corruption and anti-bribery laws, such as the Foreign Corrupt Practices Act, the Procurement Integrity Act, and the Bribery Act 2010. This means, among other things, that Partners must not pay or accept payment of bribes or kickbacks or otherwise seek to improperly influence any act or decision of a governmental official, employee or political candidate, including by offering, paying or authorizing any direct or indirect payments or anything of value for the purpose of improperly obtaining or retaining business or other advantages.

Gifts and Entertainment

Partners must ensure that all business amenities provided to customers and others comply with applicable laws, rules and requirements (including internal policies of the recipient’s employer). Gifts, entertainment, travel and other favors must never be used to influence judgment, obtain unfair preferential treatment, or gain improper advantage.

Preserving Fair Competition

Partners must comply with all applicable antitrust and competition laws. These laws vary from country to country but we expect that Partners will not engage in conduct that unreasonably restrains trade or is deceptive or misleading.



Maintaining Financial Integrity

Partners must maintain their financial books, records and accounts in accordance with applicable legal, regulatory and accounting requirements and in a manner that accurately reflects the true nature of the transactions they record. Partners must provide complete and accurate information in all submissions to Telos.

Avoiding Insider Trading

It is possible that Partners will obtain material, non-public information about Telos, its affiliates or other companies. Partners must use such information only for the purpose for which it was provided. Using such information for other purposes, such as to trade in securities or to share the information for others to trade in securities, is improper and constitutes a violation of this Code.

Preventing Conflicts of Interest

Fairness and honesty in dealings requires the ability to act free of any improper influence or distraction. If the ability to act with objectivity is compromised, there may be a conflict of interest. Telos requires its Partners to avoid any situations in which objectivity or the ability to conduct business honestly and ethically may be compromised. If a Partner is faced with a conflict of interest or a situation that could create the appearance of a conflict of interest in connection with Telos business, Telos expects the Partner to disclose the conflict to Telos.

Training and Compliance

With respect to a Partner's officers, directors, employees, subcontractors and agents who may be involved directly or indirectly in Telos business ("Partner Representatives"), Partners are expected to (1) ensure that their Partner Representatives are aware of and comply with this Code and (2) provide regular training intended to ensure that their Partner Representatives understand the issues described in this Code and comply with its terms. Telos may periodically review Partner compliance with this Code and ask Partners to certify compliance.

Tell Telos

Working together to address potentially problematic behavior is essential to ensure the future success of both Telos and its Partners. Partners are expected to contact Telos immediately concerning any actual or suspected violation of this Code, or if any unlawful or unethical situation involving or related to the sale of Telos products or services should occur. Telos can be reached at: Telos Corporation, 19886 Ashburn Road, Ashburn, VA 20147, Attention: General Counsel or telos.legal@telos.com. Alternatively, reporting of any alleged or improper conduct on the part of Telos or Partners can be made anonymously and confidentially via Alertline (1-866-448-3567), a 24/7/365 service.