



# Code of Ethics and Business Conduct

**Purpose and Leadership Commitment:** Guardian Cyber is committed to the highest standards of ethical conduct, transparency, and accountability.

*Leadership sets the tone for ethical behavior and expects all employees, officers, contractors, and representatives to act with integrity in every engagement.*

- 1. Core Ethical Principles.** Our conduct is guided by integrity, accountability, fairness, respect, and compliance with the rule of law. These principles apply to all business decisions, interactions, and operations.
- 2. Compliance With Laws and Regulations.** Guardian Cyber complies with all applicable U.S. federal, state, local, and international laws, including FAR, DFARS, procurement integrity rules, anti-corruption statutes, export controls, and labor laws.
- 3. Conflicts of Interest.** Employees must avoid situations where personal interests conflict with company interests. Any actual or potential conflicts must be disclosed promptly for review.
- 4. Gifts, Gratuities, and Business Courtesies.** Offering or accepting gifts or favors that could influence business decisions or government actions is prohibited.
- 5. Fair Competition and Procurement Integrity.** Guardian Cyber competes fairly and does not engage in bid rigging, price fixing, or misuse of non-public information.
- 6. Protection of Information and Cybersecurity.** We protect government, client, and company information using controls aligned with the NIST Cybersecurity Framework.

**7. Respectful Workplace and Equal Opportunity.** We maintain a workplace free from discrimination, harassment, or retaliation and value diversity and inclusion.

**8. Subcontractor and Partner Ethics.**  
Business partners are expected to uphold ethical standards consistent with this Code.

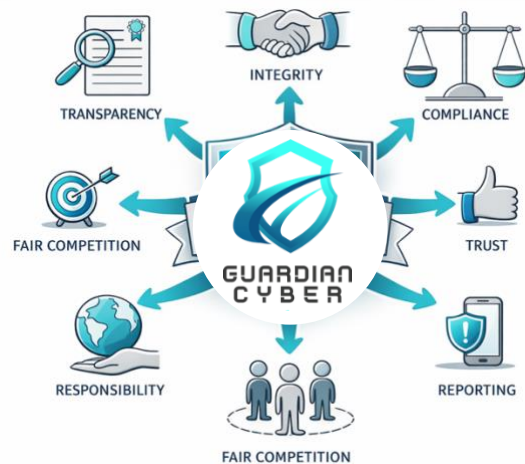
**9. Reporting Ethical Concerns.** Employees are encouraged to report concerns without fear of retaliation.

**10. Accountability and Enforcement.**  
Violations may result in disciplinary action, termination, or legal remedies.

**12. Training and Awareness.** Guardian Cyber provides ethics and compliance awareness training as appropriate.

**13. Continuous Improvement.** This Code is reviewed and updated to reflect evolving laws and best practices.

Guardian Cyber is committed to ethical conduct and compliance with applicable laws and regulations.



**Jay H. Anson**  
**General Manager**  
**Guardian Cyber LLC**