



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.

A handwritten signature of Jay H. Anson is shown above his printed title. The signature is fluid and cursive, with a horizontal line extending from the end of the signature.

Jay H. Anson
General Manager
Guardian Cyber LLC