



Code of Conduct

June 18, 2026

Welcome and a Message from Datavault AI's CEO

A cornerstone of the success of Datavault AI (“DVL” or the “Company”) has been the high degree of professionalism and integrity demonstrated everyday by our employees throughout the Company. DVL is committed to always acting ethically and providing quality products and services to our clients with integrity and professionalism, and in compliance with all applicable laws, regulations and client requirements. It is also DVL’s policy to compete fairly and in accordance with all applicable procurement rules.

This is possible only when all DVL employees perform their jobs with the highest standards of ethical conduct, with consideration of the interests of our shareholders, clients, other employees, subcontractors, suppliers and the communities affected by our work. DVL’s reputation depends on the actions employees take and the decisions they make each day. Therefore, DVL expects every employee to conduct his or her business affairs in a manner that protects and even strengthens DVL’s reputation. To formalize these expectations, DVL maintains a Corporate Compliance and Ethics Program (the “Program”).

As we grow in numbers and in the variety of clients and locales that we serve, it is important that we provide clear guidelines regarding how we should approach important issues and decisions that may arise as we strive to provide the best service(s) to our clients and the best workplace environment for our employees. This Code of Conduct (“Code”), together with our Policies and Procedures governing our operations (“Policies and Procedures”), are intended to be key sources for that guidance.

The objective of the Code is to provide information on the expectations and processes that should guide our business behavior on a variety of issues. Every effort has been made to ensure the Code is clear, practical, and consistent. However, no document can address every situation, so we encourage you to raise questions with your manager or other appropriate person in the event that something is unclear.

We are absolutely committed to conducting all of our business with the highest degree of ethics and consistent with the expectations and guidelines expressed in this Code. We hope it is a helpful guide for how we do our business, and fully anticipate that everyone from myself to the newest employee will embrace and adhere to it.

If you have any questions about our Code, please contact our Chief Compliance and Ethics Officer (the “CCEO”) at any time, day or night.

Nate Bradley
Nate Bradley (Jun 24, 2026 17:13:21 EDT)

Nathaniel T. Bradley
Chief Executive Officer
Datavault AI
June 18, 2026

Purpose and Mission of Datavault AI

Datavault AI was founded on a simple but radical premise: the people and organizations that generate data should be the ones who benefit from it. For decades, the largest technology companies in the world have built trillion-dollar enterprises by monetizing the data of individuals, businesses, and communities — without meaningfully returning that value to the actual creators of that data. The wealth generated from your data, your behaviors, your transactions, and your identity has largely flowed to intermediaries, not to you.

Datavault AI aspires to change that. Our founding mission is to become the greatest giveback platform the data economy has ever produced — returning control, governance, and monetization rights to those who rightfully own their data. We exist so that companies and individuals are empowered with the tools to decide how their data is used, who accesses it, and how they are compensated for it.

This is not a feature of what we do. It is why we do it.

Always Do the Right Thing

Most often, the right thing to do is obvious, but there may be times when it is not so clear. When that situation arises, ask yourself:



Is it Legal and Ethical?

Would I be comfortable if my manager or coworkers knew of my actions?

Is it consistent with DVL's Code, Policies and Values?

Am I doing what is right for my team members and DVL's customers?

Would I want my actions to be made public?

If you answer "yes" to all of these questions, the action is probably acceptable. Any "no" or "I'm not sure" is a signal to stop, reconsider your actions, and ask for guidance.

What is the Code of Conduct?

DVLT's Code explains what is expected of DVLT's employees and provides guidance on how to meet those expectations. More specifically, the Code describes DVLT's expectations for appropriate business conduct. At the heart of the Code are our **Core Values**:

Integrity – Integrity is a fundamental element of character, the quality from which trust is derived and the benchmark against which every DVLT employee must ultimately test all decisions. Integrity obligates and requires us to always act honestly and ethically, keep our promises, and be consistent in what we say and do.

Respect – We embrace each individual's experiences, ideas, talents, and contributions and honor and sustain a culture of diversity and inclusion. We treat others fairly and courteously, operate in a spirit of cooperation, work as a team, show empathy, and help each other. We value human dignity and encourage different ideas and opinions.

Responsibility – We accept ownership of our words and actions, which impact everyone around us, and are committed to providing quality products and services, providing a safe and secure workplace, and caring for the environment and our communities.

Customer Focus – We are committed to meeting customer needs and exceeding customers' expectations. We encourage the creation of value in our products and services and make promises cautiously, doing our utmost to meet our commitments. We believe that whoever creates data owns it and whoever owns it should control and benefit from it. It is our aspiration to put the power to own, control and monetize data into the hands of the people and organizations who create it.

Innovation – We innovate together and with our partners, with new and creative solutions, products and services that help our customers succeed and grow, powered by AI, data and collaboration. We embrace learning and creativity to provide visionary products and services that are simple, scalable, integrated and global.

Our values define how we conduct business and how we measure and evaluate our decisions and actions. DVLТ’s strong ethical reputation is a critical asset and each of us shares a personal responsibility to embrace, protect, preserve, and enhance it.

The Code is a key part of our Corporate Compliance and Ethics Program, which ensures that the Code’s provisions are communicated effectively to employees and enforced through policies, procedures, and management practices.

The Foundation of DVLТ’s Program

§8B2.1 of the United States Federal Sentencing Guidelines is entitled “*Effective Compliance and Ethics Program*” and establishes fines and penalties to be imposed on organizations for criminal violations of federal laws. However, §8B2.1 also provides that fines and penalties may be reduced substantially if a company has an internal compliance program designed to prevent and detect violations of the law. The Federal Sentencing Guidelines apply to all organizations, whether public or private, including DVLТ.

§8B2.1 establishes seven (7) elements of an effective compliance and ethics program for organizations - just having Policies and Procedures and/or a Code of Conduct for employees is not enough. These seven elements have become the standard for effective compliance and ethics programs in the compliance and ethics industry and the measuring stick for government agencies when contemplating corporate liability.

For organizations involved in government contracting, a Program that comports with §8B2.1 also meets the requirements for compliance and ethics programs established by the Federal Acquisition Regulation (FAR). DVLТ’s Program, including this Code, has been designed to comport with §8B2.1.

To Whom Does the Code Apply?

This Code applies to all officers, directors, and employees of DVLT and its subcontractors and “team” members (the “Company”) and to all of its business activities – without exception. Individual consultants whom the Company engages to perform services for its customers shall be expected to comply with this Code. As used in this Code, “employees” shall also include individual consultants and the Company’s outside directors.

How is the Code Administered?

The most current version of the Code is available on DVLT’s intranet. New hires receive a copy of the Code within ten business days of their date of hire and training on the Code within sixty calendar days of their date of hire. Yearly training on the Code is provided to all employees. On a regular basis, every employee is asked to sign a Certification that he or she has received, read, and understands the Code and agrees to comply with it. The Code is reviewed annually by DVLT’s CCEO and modified, when necessary. Any modifications or changes to the Code will be promptly communicated to all employees.

Duty to Report Actual or Suspected Code Violations

Every employee, officer, director, consultant, agent, vendor, subcontractor, or other representative of the Company having information or knowledge of any actual or contemplated conduct or transaction(s) which appears to violate DVLT’s Code, Policies and Procedures, or standards is expected to report the matter promptly to his/her supervisor or manager, to Human Resources, to any member of DVLT’s Management including any member of the Executive Management Team, to the Chief Legal Officer (CLO), via our Hotline, or to the CCEO.

DVLT's Hotline

DVLT uses an external Hotline provider that enables the reporting of concerns anonymously. The Hotline operates 24/7 and can be reached by:

- Toll-Free Calling (833) 920-0008
- Email at reports@lighthouse-services.com (include "DatavaultAI" when using email)
- On the web at [DVLT Hotline](https://report.syntrio.com/_StandardCustomURL/LHILandingPage.asp) (https://report.syntrio.com/_StandardCustomURL/LHILandingPage.asp)

Reporting may be written or oral, telephonic or via email. In addition, reporting may be anonymous – if requesting anonymity, DVLT will consider keeping the identity of the person disclosing such information confidential in so far as doing so does not impede an investigation or resolution of the matter. Confidentiality cannot be guaranteed. Failure to report actual or suspected Code violations

subjects such persons to disciplinary action up to and including immediate termination of employment without notice.

Duty to Investigate

Possible violations of DVLT's Code, Policies and Procedures, or standards will be investigated promptly at the direction of the CCEO. (See DVLT's Internal Investigations Policy)

No Retaliation

Employees at all levels are prohibited from retaliating against anyone for reporting in good faith a violation or suspected or potential violation of DVLT's Code, Policies and Procedures, or standards or for cooperating in an investigation of such an allegation.

DVLT will actively and aggressively monitor for any such retaliation. Any retaliation that can be substantiated will subject the retaliator(s) to disciplinary action up to and including immediate termination of employment without notice. (See DVLT's Non-Retaliation Policy)

Chief Compliance and Ethics Officer (CCEO)

DVLT's Compliance Charter established and empowered the position of CCEO. The CCEO is considered a part of DVLT's Executive Management Team, reports to the Board, and is responsible for overseeing DVLT's Program. The CCEO role is presently undertaken by John Hanson, an independent contractor, until the CCEO position is filled. If you have compliance questions, comments, or concerns, you may reach John at (202) 590-7702 or via email at JHanson@dvlt.ai.

DVLT's CCEO has primary responsibility for developing and implementing the Program, including, but not limited to:

- Developing, maintaining, and implementing a Code and associated Program that supports a positive ethical work environment and helps ensure compliance with all applicable legal, regulatory, and client-specific requirements;
- Creating, updating, and communicating compliance & ethics related policies and procedures;
- Conducting compliance & ethics risk assessments and ensuring that the Board is informed of the risks and that the Program timely and effectively addresses those risks in accordance with the Board's directives;
- Ensuring that compliance & ethics trainings are timely and effectively provided and that all persons have completed all required training(s);
- Ensuring that employee compliance & ethics Certifications are completed and maintained;
- Providing a channel through which employees and other parties may anonymously report suspected misconduct, compliance & ethics violations, and/or violations of laws or regulatory requirements;

- Overseeing investigations of suspected compliance & ethics violations;
- Conducting audits and other monitoring to help ensure that the Program is effective;
- Overseeing DVLT's Hotline and verifying employee awareness of and access to the Hotline;
- Recommending remedial measures for identified internal control(s) or Program weaknesses;
- Reporting to the Board on the Program, complaints, investigations, resource requirements, and any other relevant information necessary for the Board to exercise reasonable oversight of the Program and;
- Remains knowledgeable about Program best practices and trends.

All DVLT employees, irrespective of position, are expected and required to fully cooperate with the CCEO in carrying out these responsibilities.

DVLT's Role in Ensuring Success

Among other activities, DVLT works to ensure the success of its Program by:

1. Training

- Provide annual training on the Program to all employees.
- Provide specific/directed compliance & ethics training to employees based on risks and roles.

2. Hiring

- Not knowingly allowing someone who has engaged in unethical conduct to act as a principal for the Company. "Principal" includes anyone authorized to represent DVLT before current or potential clients—not just officers or senior managers.
- Not knowingly hiring—whether as an employee or a contractor—anyone who is suspended or debarred by any agency of the federal government, or who otherwise is not eligible to participate in federal programs.

3. Employee Resources

- Maintaining a secure, confidential resource that all employees can use to report unethical behavior or other employee concerns.
- Investigating possible violations of the Code, Policies and Procedures, or standards.

Code of Conduct Policy Statement

It is DVLT's policy to:

- Conduct business according to high ethical and legal standards;
- Insist that employees avoid business activities and situations that may create—or appear to create—an appearance of impropriety;
- Maintain accurate and reliable corporate records in accordance with generally accepted accounting principles and practices and other required or appropriate internal controls and recordkeeping requirements; and
- Engage in business activities in an ethical manner and in accordance with all applicable laws and regulations.

- Providing a safe and healthy work environment for our employees, clients, and visitors, and complying with all applicable federal, state, and local laws and regulations.
- Prohibiting any retaliatory action against employees who report violations or suspected violations of the Code, Policies and Procedures, or standards. Employees determined to have engaged in retaliatory behavior will be subject to disciplinary action up to and including termination without notice.

Employee Support

DVLT recognizes that employees must have access to reliable, predictable, and supportive resources that help them comply with the Code. That's why DVLT provides:

- An “open door” policy that gives every employee access to higher levels of management
- A work environment that expressly prohibits retaliation and retribution, discrimination, bullying, and harassment of any kind
- A Chief Compliance and Ethics Officer
- Engage in business activities in an ethical manner and in accordance with all applicable laws and regulations
- A 24/7 Hotline where employees can anonymously communicate concerns by:
 - Toll-Free Calling (833) 920-0008
 - Email at reports@lighthouse-services.com (include “DatavaultAI” when using email)
 - On the web at [DVLT Hotline](https://report.syntrio.com/_StandardCustomURL/LHILandingPage.asp)
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Role of DVLТ’s Employees in Ensuring Program Success

DVLТ’s employees are the face of DVLТ. It is our employees who, day in and day out, interact with our customers, vendors, suppliers, one another, and the public-at-large. Consistent with guidance provided in this Code, each of us must be committed to living our values, acting always with integrity and fairness, and serving as role models, through our words and actions, of upstanding ethical behavior.



To report a concern, issue, or suspected Code, Policy of Ethics violation, you may:

- Speak with your Supervisor or a member of Human Resources
- Speak with any DVLТ Executive
- Speak with the Chief Compliance and Ethics Officer
- Use our Hotline

To better understand and appreciate the behaviors expected of DVLТ employees, each DVLТ employee is responsible for reading and abiding with this Code and participating in compliance and ethics trainings. DVLТ employees must also know and follow all DVLТ Policies, laws, and regulations that apply to our work.

Regardless of your position with DVLТ, if you have information about or knowledge of any actual or contemplated misconduct, conduct, or transaction that appears to violate DVLТ’s Code, Policies and Procedures, or standards, you are expected to report the matter promptly to your supervisor or manager, to Human Resources, to any member of DVLТ’s Management, including any member of the Executive Management Team, to the CLO, via our Hotline, or to the CCEO. You can make such reports in person, by telephone, or in writing (including email). Requests for anonymity from reporting employees will be honored to the extent reasonably possible, but anonymity cannot be guaranteed.

If you want to remain anonymous, you may report your concern using our Hotline, which notifies our CCEO when a report is made. When using the Hotline, employees are asked to provide sufficient and detailed information so as to enable adequate investigation. Anonymous reporters should also realize that their anonymity makes providing follow-up to them unlikely.

Role of DVLТ’s Management in Ensuring Program Success

Though we view all DVLТ employees as leaders, our Managers and Supervisors have more formalized leadership expectations and, therefore, additional responsibilities in ensuring the success of our Program. In particular, they are expected to:

- Promote and demonstrate upstanding ethical tone and behavior
- Communicate compliance and ethics concerns and issues – up and down the chain of command
- Hold employees accountable for completing all Certifications and training requirements
- Foster work environments that encourage open and honest communications and raising of concerns
- Report known or suspected ethical misconduct, Code or Policy and Procedures violations, or illegal actions promptly and to the appropriate DVLТ person(s)

Laws and regulations are complex and subject to change often. They can also vary from State to State, Country to Country, or by nature of the client (private or governmental). Accordingly, all DVLТ employees must be aware of and familiar with our Code, Policies and Procedures, and the laws and regulations applicable to each persons’ job responsibilities and functions. All new policies or changes to existing Policies and Procedures will be communicated to all employees timely and a copy made available online. When in doubt, consult first a supervisor and/or DVLТ’s Policies. If you have further questions, please contact the CCEO, Human Resources, or DVLТ’s CLO.

- Honor and respect the confidentiality, to the greatest extent practical and legally allowed, of those who, in good faith, raise concerns or participate in internal investigations
- Ensure that those who report concerns are not retaliated against and report any concerns about such retaliation immediately

Role of DVLТ's Partners in Ensuring Program Success

DVLТ expects that our teaming partners, subcontractors, contractors, agents, consultants, suppliers, and others working on our behalf conduct themselves in a manner consistent with this Code, as well as any applicable DVLТ Policies, laws, and regulations.

We exercise caution when considering whom we may engage or retain to act on our behalf, particularly in the areas of sales agents, marketing representatives, shippers, distributors, trainers, or dealers.

If you know of or suspect any such parties to be acting unethically or involved in misconduct, report it to DVLТ Management, our CLO, the CCEO, or using our Hotline.

Guidelines for Doing Business

Employees are expected to exercise good judgment and maintain high ethical standards and personal integrity while conducting business on behalf of DVLТ, including while they are traveling on Company business.

Accounting Policies

DVLТ's operations must be accounted for and recorded in accordance with legal requirements and Generally Accepted Accounting Principles. The integrity of the Company's accounting is based on the validity, accuracy, and completeness of its systems and records. Every employee — regardless of position — who is involved in creating, processing, or

recording accounting information for DVLT, including time-keeping, is responsible for the integrity of that information. Investors rely on accurate and complete information in order to understand DVLT's financial performance and to have confidence in our plans. Keeping accurate business records is essential to maintaining investors' trust, making sound business decisions, and meeting our regulatory obligations as a publicly traded company.

No false or intentionally misleading entries may be made in DVLT's systems, records, or related documentation.

Accurate Recording of Expenses

Properly record and document any expenses made by or on behalf of DVLT. This includes expenses related to any client, supplier, or other entity doing business with DVLT, as well as their employees or agents. Please see DVLT's Policies for information on how to properly record expenses and other relevant limitations.

Combatting Trafficking in Persons

DVLT has a zero-tolerance policy regarding those who engage in or support trafficking in persons, procurement of any sex act on account of which anything of value is given or received by any person, or use of forced labor. No Company employee shall engage in, condone, or support such activities and all employees should be aware of and report any such concerns immediately to DVLT's CCEO, CLO, Management, or Hotline.

Compliance With All Applicable Laws and Regulations

Violating the law can have a devastating and lasting effect on the persons involved, as well as DVLT. Employees who break the law, such as, for example, the False Claims Act, may be subject to disciplinary action, including termination. They may also subject themselves individually, as

well as DVLТ corporately, to criminal and civil liability, fines, a compromised record, and possible imprisonment.

For government clients served by DVLТ, violating the law or certain regulations may result in DVLТ's suspension or debarment from all federal contracting or contracting with a particular client. **One person's misconduct puts all of DVLТ, and its employees, at risk.**

Conflicts of Interest

As an employee of DVLТ, you should not place yourself in a position where your actions or personal interests are, or are reasonably likely to be perceived to be, in conflict with the interests of the Company. A conflict of interest is any circumstance that would cast doubt on an employee's ability to act with total objectivity with regard to DVLТ's interest. DVLТ seeks to avoid the appearance of, as well as any actual, conflicts of interest. Employees in doubt about a potential conflict should speak with the CCEO, CLO, or someone in Management. The following examples of conflicts of interest are guidelines and not meant to be all-inclusive:

- No employee may engage in an independent business venture or perform work or services for another organization to the extent that the activity prevents the employee from devoting the time and effort to the business of DVLТ as required by his or her position.
- No employee or family member may have, directly or indirectly, a significant financial interest in, involvement with, or obligation to any business organization which does or seeks to do business with DVLТ unless the interest or obligation has been fully disclosed in writing to the employee's business line leader, and it has been determined that the employee's duties for DVLТ will not require him or her to make decisions or take actions that could be influenced by such interest, involvement, or obligation.

- No employee may appropriate or divert a business opportunity of DVLT to herself/ himself or any other person or organization.
- No employee may participate in a decision-making process involving circumstances that present a conflict of interest. This includes employment and/or assignment related decisions regarding a family member or other person with whom the employee has a close personal relationship.

Employees are to maintain independence and objectivity with clients, the community and DVLT. Before entering into any employment, contractual, creditor, consulting and consumer relationship, an employee must ensure that no express or implied conflict of interest exists. Employees are called upon to maintain a sense of fairness, civility, ethics and personal integrity in all business transactions.

Hiring Practices Involving Current or Former Military/Federal Employees

Special restrictions apply to hiring or retaining a government or former government employee (including military officers) as an employee or consultant of the Company. In addition, there are special constraints regarding any communication(s) concerning possible employment of government employees who are designated as “procurement officials” during the conduct of any procurement action and otherwise. In order to be sure that you do not violate any of these restrictions, contact Human Resources for advice before discussing the possibility of employment with any government official.

Authorization from Human Resources must be obtained before entering into any talks relating to proposed employment with current government employees. Such talks should begin only after the government official has publicly announced that he/she is leaving government service. In addition, any plans to employ retired military officers of general or flag rank, or civilian officials having the rank of

Deputy Assistant Secretary or above, must be approved in advance by DVLT's CLO and Head of Human Resources.

Organizational Conflicts of Interest ("OCI")

An OCI may result when factors create an actual or potential conflict of interest on an instant contract, or when the nature of the work to be performed on the instant contract creates an actual or potential conflict of interest on a future acquisition. In the latter case, some restrictions on the future activities of DVLT may be required. Following are some examples of types of OCI's:

- Biased Ground Rules – May occur when the contractor has input into setting the ground rules for a competition in which it (or an affiliate) may participate, for example:
 - Contractor helps Government write the Statement of Work or other specifications for an upcoming procurement
 - Contractor has the ability to specify goods or services that can only be provided by itself (or an affiliate)
- Unequal Access to Information – May occur when a contractor has access to nonpublic information that may provide it with a competitive advantage in future competitions, for example:
 - Contractor in the course of its work gains access to financial or technical information related to competitors
 - Contractor gains access to Government needs or procurement strategy
- Impaired Objectivity – Involves situations where a contractor's work under one contract could entail evaluating itself, a related entity, or a competitor. Also occurs where a contractor could have

the ability to steer work to itself or a related company or away from a competitor. Examples:

- Contractor has responsibility for determining where particular work is conducted
- Contractor does quality assurance/quality control on an affiliate or competitor
- Contractor provides administrative personnel in procurement sensitive areas (e.g. overhearing procurement discussions)

Fraud and Misrepresentations

Never lie or make false or deceptive claims to promote DVLT or its services. DVLT employees must not engage in or permit any activities that involve fraud or misrepresentation(s) regarding any aspect of DVLT's business. Also, as noted above in this Code, DVLT employees have a duty to report such concerns.

Gifts and Gratuities

Employees must be careful about giving or receiving gratuities, gifts and other business courtesies because even gestures that seem simple and innocent can be harmful to DVLT's reputation and ability to conduct business. They may also violate laws and/or regulations, or third-party Codes of Conduct/Policies. Employees are advised to review DVLT's Gifts and Gratuities Policy and to contact a member of management or the CCEO for additional clarification or questions.

No Offers

No gift, favor, offer, benefit, promise to pay, or anything else of value may be offered, made, or authorized by or on behalf of DVLT for any questionable, improper, or illegal purpose.

No bribes or kickbacks may be offered, made, or authorized, by or on behalf of DVLT.

No Solicitations

No gift, favor, offer, benefit, promise to pay, or anything else of value may be solicited or accepted by or on behalf of DVLT for any questionable, improper, or illegal purpose.

Limitations on Gifts

A gift can be a gratuity, favor, discount, cash, gift certificate, entertainment, hospitality, loan, promise to not collect a debt, or other item having monetary value. Keep in mind that this also applies to services as well as gifts of training, transportation, local travel, lodging, and meals.

DVLT serves both commercial and governmental clients, which requires particular attention as it concerns gifts. Accordingly, DVLT's Gift and Gratuities policy distinguishes and directs gift giving and receiving as it applies to our federal government clients, our state and municipal government clients, and our commercial clients.

Federal Government

With Federal government employees and our Federal clients, gift giving and receiving is prohibited (“no gifts”).

State(s) and Municipalities

With state and municipal government employees and clients, we follow specific state or municipal rules regarding gift giving and receiving. If you would like assistance with researching specific state or municipal rules, contact DVLT's CLO or the CCEO.

Commercial (Non-Government)

With commercial clients and employees, DVLТ respects the clients' gifting rules and, if such rules allow gifts, has set dollar limits that enable legitimate business development activities while ensuring adequate monitoring and auditing efforts. These dollar limits are:

- Gifts of \$50 or less; meals or entertainment of \$100 or less require no pre-approval.
- Gifts greater than \$50 up to \$250 and meals or entertainment greater than \$100 up to \$500 require the prior approval of the appropriate Director or above (Directors may self approve).
- Gifts greater than \$250 up to \$350 and meals or entertainment greater than \$500 up to \$1,500 require the prior approval of the appropriate Vice-President or above (VPs may self approve).
- Gifts greater than \$350 up to \$1,000 and meals or entertainment greater than \$1,500 up to \$2,500 require the prior approval of the appropriate C-Suite Member or above (C-Suite Members may self approve).
- Gifts above \$1,000 and meals or entertainment above \$2,500 must be approved by the CEO (CEO may self approve).

Limited Exceptions:

Some things are excluded from the definition of a gift. For example, a gift is not:

- Non-alcoholic beverages, snacks, or other inexpensive food items if they are not a part of a meal

- Greeting cards, presentational plaques, certificates, or trophies
- Prizes in contests open to the general public
- Commercial discounts available to the general public (including to government employees)
- Honoraria - Employees may, with the prior written approval of their supervisor, receive honoraria for lectures and other such activities while on personal days, compensatory time, annual leave or leave without pay. If the employee is acting in any official capacity, honoraria received by an employee in connection with activities relating to employment with DVLТ are to be paid to DVLТ.

For more details, please refer to DVLТ's Gifts and Gratuities Policy. You may also contact the CCEO for assistance with questions or concerns.

Government Contracting

DVLТ values our government customers and recognizes that the laws and regulations associated with serving them are generally more complex and stricter than those for our commercial customers. We have highlighted some of the more common areas within other sections of this Code (i.e., Conflicts of Interest, Gifts and Gratuities, Regulation and Competition, etc.). DVLТ is absolutely committed to complying with the requirements of the Federal Acquisition Regulation and all other relevant laws and regulations when conducting business with the U.S. Government.

We promote procurement integrity by, among other things:

- Not allowing gifts of any kind or value with federal government employees;

- Never attempting to obtain or use: 1) government confidential information or source selection information or 2) other contractor's nonpublic bid or proposal information, such as costs, pricing, or proprietary information;
- Not discussing job or business opportunities with current or former government officials or employees, military personnel or their family members unless properly authorized by DVLT;
- Ensuring that all information submitted in government contract proposals and negotiations is accurate, complete, and current;
- Ensuring that we fully comply with all requirements for each federal government contract we have and report complete and truthful information about our performance on a federal government contract when required or requested;
- Ensure that we account for our hours, expenses, and costs in accordance with all federal government contracting laws and regulations and;
- Ensuring that our subcontractors are qualified and understand that there are requirements in our federal government contracts applicable to their subcontract with DVLT, including their agreement to abide by DVLT's Code and applicable Policies.

DVLT employees must understand and appreciate that violations occurring in serving federal government agencies bear substantial penalties. In addition to criminal prosecution, civil penalties, and fines, any federal agency can suspend or debar DVLT from **ALL** federal government contracting (not just with the agency at issue). The decision to suspend or debar an organization from federal government contracting is essentially an issue of trust – can that agency trust you to do business with them. We must never take any action(s) that violates the trust that we have earned and honor with the federal government customers DVLT serves.

U.S. Government Classified Information

Security regulations that govern and/or relate to the protection of government classified information are complex and vary by government agency/department. DVLТ is required to properly safeguard and control access to all government information that is classified for protection and is in our possession. Each DVLТ employee, as well as our subcontractors, consultants and visitors, must familiarize themselves with all applicable security regulations/requirements and hold applicable clearance(s) prior to gaining access to classified information.

For security assistance and information, please contact DVLТ's Vice-President of Global Security. If you have any questions about the laws or regulations that may affect government contracting work you do on behalf of DVLТ, please contact your Manager, Supervisor, or DVLТ's CLO.

FAR Mandatory Disclosure Rule

Contracting companies must timely disclose to the affected federal government agency's Office of Inspector General and Contracting Officer whenever, in connection with a contract award, performance, or closeout of a contract, if the contractor has credible evidence that a principal, employee, agent, or subcontractor has committed certain crimes or engaged in certain misconduct. To not do so is a crime itself and subjects the contractor to numerous and severe penalties, including possible prosecution and suspension/debarment from federal government contracting.

It is DVLТ's responsibility to make such a disclosure, not a DVLТ employee. Therefore, it is imperative and required that you report any suspected fraud, waste, abuse, or misconduct to DVLТ's CCEO, CLO, or member of DVLТ's Management immediately. You may

also use our Hotline to report such concerns. Your concerns will be investigated in accordance with DVLT's Internal Investigations Policy and, if required, disclosure made to the affected federal government agency.

Truth in Negotiations Act (TINA)

DVLT must comply fully with TINA in the conduct of its U.S. Government business. The purpose of TINA is to give the Government an effective means of negotiating a fair and reasonable price. TINA requires disclosure of cost or pricing data and certification that such data are accurate, complete, and current. Employees involved in negotiating Government contracts and subcontracts must ensure that all cost and pricing data, communications and representations of fact are accurate, complete, current and truthful.

Insider Trading

We care for and protect the information we are entrusted with and never use or share inside information (see DVLT's Insider Trading Policy) about DVLT or any other business/company for the purpose of trading securities (e.g., stock). Through the work we perform and people we interact with, we may learn confidential information about DVLT or other companies that is not yet known publicly. DVLT's reputation depends on our protecting such information and never sharing or using it improperly.

Important things to know:

- Information that is material and not available to the public is called "material non-public information." Information is "material" if a reasonable investor would consider it important in deciding whether to buy, hold or sell a company's securities.

- Insider trading happens when a person trades securities on the basis of material non-public information or shares such information with others who trade on the basis of that information.
- Common examples of material non-public information include:
 - Key changes in management
 - Financial results that have not been released
 - Pending or proposed mergers and acquisitions
 - Information about upcoming strategic plans, such as but not limited to, joint ventures
 - News about entering into or losing a major contract with a customer or supplier
 - Details about new products, services, or discoveries (e.g., research and development) that are not yet public

Persons who possess material non-public information concerning Company business or that of Company customers, suppliers, vendors, business partners, or competitors may not trade in the Company's securities or those of such customers, suppliers, vendors, business partners, or competitors nor reveal the information to anyone (or provide trading "tips" based upon such information) until the information has been effectively disclosed to the public. These prohibitions are based on federal securities laws, and, as used in those laws, "material" information is information that a reasonable investor likely would consider important in deciding to purchase or sell a security and that could affect the price of the security.

Trading securities while knowing or in possession of material non-public information or sharing it with others so that they may trade securities is illegal. Punishments for violations may include significant fines and imprisonment (e.g., jail).

We prevent insider trading by, among other things:

- Never buying or selling shares or other securities, directly or indirectly, in DVLT or any other publicly traded company when in possession of material non-public information.
- Understanding what could be considered material non-public information and protecting it from accidental disclosure.
- Compliance with all trading windows, blocks and closures, including for transactions in DVLT securities, regardless of the trading platform utilized. Note that there may be certain limited exceptions (please see DVLT’s Insider Trading Policy).
- Never sharing/giving material non-public information to others so that they may trade (aka “tipping”).
- Only sharing confidential information and material non-public information with employees who have a business need-to-know and never sharing it with relatives, friends or anyone outside of DVLT, except under a confidentiality or non-disclosure agreement approved by DVLT’s legal counsel for legitimate business purposes.
- Only trading securities after material non-public information becomes publicly available and investors have had time to absorb it.

This Code provides only a high level of summary of DVLT’s Insider Trading Policy, which is available to all employees online.

International Business

DVLT acts with integrity and ethically in all of our business dealings and complies with all applicable laws and regulations wherever we do business. Almost every country in the world prohibits making payments or offers of anything of value to government officials, political parties or candidates in order to obtain or retain business. We must never pay commissions or fees to dealers, distributors, agents, finders, or consultants that are used as a bribe or kickback.

As a U.S. based business, many laws apply to DVLT both inside and outside the U.S. Among these are laws that:

- Ensure that companies do not cooperate in any way with unsanctioned boycotts;
- Restrict trade with certain countries or persons;
- Prohibit dealings that could aid terrorists or organizations that support terrorists; and
- Require that transactions are not being used for purposes of money laundering.

Following are several areas that may pose a risk to DVLT and other companies doing business internationally:

Anti-Corruption

There are numerous laws associated with anti-corruption which apply to DVLT, most directly the U.S. Foreign Corrupt Practices Act (“FCPA”). The FCPA makes it a crime to pay or offer to pay anything of value, directly or indirectly, to any non-U.S. official, including employees of state-owned organizations, political candidates or anyone acting on behalf of a public organization. The FCPA also requires that all publicly-owned companies maintain a system of internal controls and books and records that accurately reflect every transaction.

All employees, representatives, subcontractors, consultants, agents and joint venture partners acting on behalf of DVLT or its controlled subsidiaries must fully comport with the provisions of the FCPA and no violations will be tolerated. All third-parties who interact on DVLT’s behalf with a foreign government or government controlled entity must be provided with a copy of this Code and DVLT’s Anti-Corruption Policy, which they must agree to comply with.

The rule at DVLТ is very simple: We do not pay bribes. DVLТ considers a “bribe” to be anything that has a value and is offered, promised, or given to influence a decision to do business with DVLТ. This includes obtaining new business, retaining existing business, or gaining any other improper advantage.

Be aware that a “bribe” may be something other than a payment (e.g. cash) offered to improperly influence a decision. It can take the form of a gift, favor, job, or offer of entertainment or travel. This applies not just to a person him or herself, but to that person’s family members, business interests, etc. – anyone that might influence that person’s decision-making. For example, helping a foreign official’s son to get an internship or paying costs for that person to attend a conference could be considered a “bribe.”

DVLТ does not discourage individual employees, officers, or directors from participating in the political process in their own right, including the making of voluntary contributions to candidates or parties of their choosing. But outside of the U.S., DVLТ may not make political contributions and you must ensure that your own political contributions are never conditioned upon any agreement or understanding to take or not take any particular governmental action on behalf of DVLТ.

This same caution also applies when considering contributions for charities, communities, or social responsibility projects when someone associated with such activities is also associated with the government. Such contributions should be approved in advance by DVLТ’s CLO and CEO.

The FCPA is a complex law, with many “gray areas” (e.g. “facilitating payment”) that can be encountered. Similar laws in other jurisdictions, such as the UK Bribery Act, are similarly complex and may be applicable to DVLТ in certain situations. If you have any questions regarding DVLТ’s Anti-Corruption Policy, contact DVLТ’s CLO or the CCEO.

A Facilitating Payment is:

A small payment (sometimes referred to as a “grease payment”) made directly to a government official to perform or expedite a routine, non-discretionary government action to which DVLТ is already entitled, such as for processing governmental paperwork, loading or unloading cargo, picking up or delivering mail, or obtaining phone, internet, water or power supply.

Trade Compliance

DVLТ is committed to honoring the laws and regulations that restrict or prohibit business or trade with certain countries, entities, or individuals. These laws and regulations include U.S. trade restrictions, import and export controls, and anti-boycott laws, as well as trade restrictions and import and export controls enforced by other countries where DVLТ conducts business or the United Nations. DVLТ may be subject to these restrictions due to our involvement in transactions connected with the U.S. or their affiliation with DVLТ. For example, using U.S. Financial Institutions (e.g. banks), routing paperwork through the U.S. for processing, or receiving help from a U.S. citizen located anywhere in the world may be sufficient involvement for these restrictions to apply.

U.S. laws and regulations prohibit or restrict certain dealings with designated persons/parties and entities controlled by or otherwise associated with sanctioned countries, persons, or parties engaged in sanctioned activities, such as terrorism, narcotics or human trafficking, and the manufacture and/or distribution of weapons.

Following are some ways in which we can respect trade laws:

- Comply with import and export laws and regulations associated with the countries in which we do business.
- Be aware that the laws of more than one country may apply in cross-border transactions.
- Ensure that anything intended for import or export is properly classified in advance, based upon the country of origin, the destination, the end use and the end user – secure all required documentation, labeling, licensing, permits, and approvals.
- Do not conduct business with countries subject to U.S. or other applicable trade embargoes or economic sanctions.
- Do not participate in boycotts that the U.S. does not support – if you receive requests to comply with a boycott or supply boycott related information, contact DVLT's CLO.
- Do your part to ensure the integrity of our supply chain by communicating our trade compliance policies to parties conducting business on DVLT's behalf.
- Violations of trade laws and regulations can result in the loss of import and export privileges, as well as civil and criminal penalties.

Trade compliance is a very complex area. When in doubt about trade regulations or policies, seek guidance from DVLT's CLO or CCEO.

Loans

With the exception of common business transactions with banks or other financial institutions, employees may not make loans to or borrow from individuals or organizations that do business with DVLT.

Lobbying Activities

DVLT is prohibited from using federal funds to pay persons, such as lobbyists or consultants, to influence or attempt to influence executive or legislative decision-making in connection with the award or modification of any Government contract. No employee may hire such a lobbyist or consultant without the CEO's prior written authorization.

Political Contributions

Corporations are prohibited from making contributions of money or other resources to candidates, officeholders and political parties at the federal level. DVLT respects the right of employees to be involved in political activity and to contribute their own time and resources. Such activity, however, must not take place on Company time or property, nor involve the Company's name, and the Company will not reimburse employees for any contributions they may make. Laws and regulations governing contributions to state and local candidates vary from state to state, and all employees shall act in accordance with all such laws and regulations. Questions concerning political contributions should be directed to DVLT's CLO.

Outside of the U.S., DVLT employees shall not use either DVLT funds or their own funds to make direct or indirect payments or give Gifts, whether in the form of money or any other thing of value, to a political party or member of a political party without prior written approval from DVLT's CLO.

Primary Employment

If you are a full-time employee, we expect you to consider DVLT to be your primary employer. Any outside employment or business activities must be secondary to your position at DVLT and not interfere with your employment duties.

Exercise caution when developing independent business opportunities with other companies. You and DVLT may need to use teaming agreements, non-compete agreements, and/or nondisclosure agreements to minimize the potential for conflicts between your interests and the interests of DVLT. Contact a member of Executive Management Team, the CLO, or the CCEO if you have questions about your individual business relationships with other companies.

Privacy and Security of Personal Information

Our roles may requires us to collect, store and utilize personal information of those whom we serve which may be protected under federal and state privacy and security laws. Such information may include Personally Identifiable Information (“PII”) and these laws require PII be handled in a confidential manner. International privacy laws, which can be highly restrictive, may also apply to certain information that we collect and maintain.

PII refers to any data that can be used to identify a specific person/individual. It includes direct identifiers, such as a person's name, social security number, or physical address, as well as indirect identifiers, which can identify someone when combined with other information, such as a person's occupation or date of birth. Various countries, States, regions and regulations use varying terms, names or definitions of PII. For example, the European Union's General Data Protection Regulation (GDPR) refers to PII as "personal data," and the California Consumer Privacy Act (CCPA) uses ther term "personal information."

Our protection of PII is critical for maintaining privacy and security. When we collect, store or process PII, it can be made vulnerable to breaches, interception or leaks, potentially leading to identity theft or other malicious activities.

You should always remember that those we serve, including colleagues using our services, count on us to protect their personal information. In addition, protecting PII and the confidentiality of those we serve is a condition of employment with the Company.

When dealing with a person's personal information you must:

- Use and disclose only the minimum necessary amount of PII to perform the required work, including:
 - Sharing PII with the minimum number of people necessary
 - Viewing only the minimum amount of such person's information required.
- Disclose PII only with appropriate written authorization from such person, unless the law authorizes or requires disclosure.
- Never view such person's, or another customer's or colleague's, personal information out of curiosity.
- Appropriately dispose of unneeded copies of documents containing PII.
- Keep documents with confidential information out of sight, such as in a locked file cabinet or desk drawer, and never leave PII active on computers, in a printer tray, in fax machines or other generally accessible areas.
- Ensure that PII transmitted or transported outside of the Company to third parties is encrypted. This includes not only emails, but also PII stored on portable devices, such as USB devices, disks, laptops and mobile devices.

The privacy and personal information of those we serve is central to what we do at the Company. Violating these or other privacy requirements will result in disciplinary action, including, but not limited to, termination, even for a first offense. Violations can also result in civil and/or criminal penalties for the Company and persons involved with any such violation.

Protecting DVLТ's Intellectual Property

Every employee of DVLТ has a fiduciary relationship to DVLТ. All information relating to the internal operations of the organization is strictly confidential. Divulging any such information to non-employees is cause for immediate termination of the employee.

DVLТ's assets include not only physical items, but also the knowledge, information, processes, ideas, procedures, and practices that have been developed over time and define how DVLТ functions. Employees must protect this intellectual property. Disclosure of these proprietary assets may result in disciplinary action up to and including termination without notice and the pursuit of legal action against the employee.

All materials pertaining to or developed for DVLТ are considered confidential. Upon completion of certain projects, and with the consent of the client, such information may become available for dissemination. However, during the course of specific projects, findings should not be discussed with anyone other than the client's project staff or members of DVLТ's staff.

Employees must acknowledge in writing that as a result of employment with DVLТ, they will be making use of, acquiring and adding to confidential and proprietary information of DVLТ, including but not limited to trade secrets. Such trade secrets and other confidential and proprietary information shall be deemed to include, but not limited to, the business methods, ideas, confidential reports, policies, data and databases, lists of customers and potential customers, the nature and type of services rendered by DVLТ and the fees paid for them.

Employees must agree to hold such information in strict confidence and shall not at any time, during or following the term of employment, except in connection with duties to DVLТ, directly or indirectly divulge, disclose

or make use of, for any purpose whatsoever, any of such trade secrets or other confidential or proprietary information.

Furthermore, upon termination of their employment, employees must immediately turn over to DVLT all copies of DVLT's trade secrets and other proprietary and confidential information in their possession, whether furnished to the employee by DVLT or compiled or obtained by the employee in the course of his/her employment.

Private Information

DVLT respects the legitimate privacy interests of its employees and complies with laws regarding releases of personnel information. Such information may include but is not limited to, medical and insurance records; benefit information; personnel files; discipline reports; employment agreements; drug test reports; credit and criminal checks; and disability and accommodation information and requests.

Intellectual Property

The systems, processes, and software designs prepared by DVLT are the Company's intellectual property. We may grant licenses to our intellectual property to other parties. In some cases, DVLT may have acquired intellectual property from third parties through development, purchases, or licensing agreements.

All designs, inventions, techniques, or other intellectual property created by DVLT employees during their employment are considered "work for hire" that belongs to DVLT. DVLT owns the rights, titles, and privileges that accompany the authorship of intellectual property, including the right to copyright, publish, copy, and make derivative works of that property.

Trade Secrets

A trade secret is information that gives DVLТ an advantage over its competitors. Trade secrets can be formulas, patterns, devices, programs, methods, techniques, processes, or compilations of information that are valuable because only DVLТ knows about them. If another organization or individual learns about a trade secret, it loses its value as a source of competitive advantage. Trade secrets are legally protected and DVLТ can pursue action against parties that try to obtain them. Therefore, employees who know DVLТ trade secrets must take steps to protect them.

Practical Steps to Keeping Trade and Business Secrets Protected

Employees with access to DVLТ's trade and business secrets must protect the information from accidental or purposeful disclosure:

- If you are responsible for either DVLТ's or a client's trade or business secrets, ensure that they are physically and/or electronically secure.
- If you review such trade or business secrets on your computer monitor, particularly on a laptop while traveling or outside of the office, ensure that others cannot view your computer screen.
- Never leave files of DVLТ or client trade or business secrets open and unattended.
- Do not take DVLТ's or a client's trade or business secret information out of DVLТ's offices unless specifically authorized by your manager.
- If those you supervise work with trade or business secrets, make sure that they understand the importance of protecting that information and how to do so properly and effectively.

Regulation and Competition

Fair competition is the basis of the private enterprise system, and DVLT supports laws that ensure equitable competition in the markets we serve. Through our business practices, we strive to increase sales by providing the best possible quality, price, service, and value to our clients, and not through any questionable means. We know that quality work, reasonable prices, and excellent products and services will help us to continue our success and growth. Employees should be aware of the laws and regulations that govern competition, so that they can help maintain DVLT's fair business practices and reputation as a fair market competitor (see also DVLT's Antitrust and Unfair Competition Policy).

Antitrust Laws

Antitrust laws prohibit business practices that restrain fair trade, such as price-fixing conspiracies, corporate mergers that weaken the competitiveness of a market, and predatory practices designed to achieve and/or maintain monopoly power. DVLT strictly complies with antitrust laws.

Enacted in 1890, the Sherman Antitrust Act prohibits agreements among competitors to fix prices, manipulate bids, or engage in other anticompetitive activity. The Antitrust Division of the U.S. Department of Justice prosecutes Sherman Antitrust Act violations.

Here are a few details about Sherman Act violations:

- They are felonies.
- If the offense was committed before June 22, 2004, punishment is a fine of up to \$10 million for corporations and up to \$350,000 or 3 years imprisonment (or both) for individuals.

- If the offense was committed on or after June 22, 2004, punishment is a fine of up to \$100 million for corporations and \$1 million for individuals, and/or a sentence of up to 10 years.
- For some violations, the maximum potential fine may be increased above the Sherman Act maximums to as much as twice the gain or loss involved.
- A corporation or individual convicted of a Sherman Act violation may be ordered to reimburse victims for all overcharges.
- Victims of bid-rigging and price-fixing conspiracies may sue violators for up to three times the amount of the damages they suffered.

Following are common types of Antitrust Violations:

Price Fixing

Price fixing is an agreement among competitors to agree on prices for their goods or services. This restricts price competition and is against the law. Price fixing can take different forms. Competitors do not have to charge exactly the same price, and not every competitor in an industry must join the conspiracy.

Price fixing can be agreements to:

- Establish or adhere to price discounts
- Hold prices firm
- Eliminate or reduce discounts
- Adopt a standard formula for calculating prices
- Maintain price differentials between different types, sizes, or quantities of products or services

- Adhere to a minimum fee or price schedule
- Fix credit terms
- Not advertise prices

Bid Rigging

Through bid rigging, conspiring competitors can manipulate prices in a competitive bid situation. Competitors agree in advance who will submit the winning bid on a contract. Just as with price fixing, it is not necessary that all bidders participate in the conspiracy.

Bid rigging conspiracies usually fall into one or more of the following categories:

- Bid Suppression: Competitors who would normally bid for work, or who have previously bid for work, agree to not bid or withdraw a bid so that only one competitor—the one that the competitors all agree upon—wins the work.
- Complementary Bidding: This occurs when competitors agree to submit bids that the buyer will not accept because the bids are too high and/or involve unacceptable terms. Such bidding may appear to be genuinely competitive, but it is not. Such schemes are designed to conceal secretly inflated prices. This is also sometimes referred to as “cover” or “courtesy” bidding.
- Bid Rotation: In a bid rotation scheme, all the conspirators submit bids, but take turns being the lowest bidder. Such schemes can vary. For example, competitors may take turns on contracts according to the size of the contract and/or the size of each conspirator company.

- Subcontracting Scheme: In a subcontracting arrangement, competitors who agree to not bid or submit a losing bid receive subcontracts from the successful bidder. In some schemes, a low bidder will agree to withdraw its bid in favor of the next low bidder in exchange for a secret subcontract that divides the contract revenue(s) between them.

Market Division

In market division or allocation schemes, competitors agree to divide markets by customers, products, or territories. Each conspirator can sell to customers or bid on contracts involving certain customers or types of customers, certain products or types of products, or certain territories. But they cannot sell to customers or bid on contracts allocated to the other competitors in the scheme.

In other market division schemes, competitors agree to quote intentionally high prices, or to not sell to, clients in geographic areas allocated to conspirator companies.

Reporting Practices

If employees are asked for information during audits (internal and external), by the CCEO, or by DVLT's accountants or legal counsel, they must provide complete and accurate information. No one in the company may conceal information that is necessary for the preparation of accurate books, records, accounts, and financial statements.

Restrictions on Conducting Similar Business

DVLT employees must have prior written approval of DVLT's CEO and CLO to:

- Engage in the same or similar lines of business as conducted by DVLT while employed by DVLT; or
- Volunteer at or work for another entity (company, firm, business) that conducts the same or similar business as DVLT. This includes serving on the board of directors or similar advisory board of an entity (company, firm, or business) that either does business with DVLT or that competes or could reasonably compete with DVLT.

Restrictions on Endorsements

DVLT employees may not endorse any product, service, or organization on behalf of DVLT unless specifically authorized by an authorized official of the Company.

Securities Laws

As a publicly traded corporation, DVLT is subject to U.S. Securities and Exchange Commission (SEC) rules and regulations. Among the most publicized of these regulations, the Sarbanes-Oxley Act of 2002, mandated reforms to enhance corporate responsibility, enhance financial disclosures, and combat corporate and accounting fraud. The reforms of the Sarbanes-Oxley Act are becoming best practices for mid- to large-size corporations.

The laws that govern the U.S. securities industry are listed in the box to the right. If you would like

Dodd-Frank Wall Street Reform and
Consumer Protection Act of 2010

Sarbanes-Oxley Act of 2002

Investment Advisors Act of 1940

Investment Company Act of 1940

Trust Indenture Act of 1939

Public Utility Holding Company Act of 1935

Securities Exchange Act of 1934

Securities Act of 1933

more information about how any of these regulations impact DVLT, contact DVLT's CLO.

DVLT's Workplace

DVLT strives to create and maintain a work environment in which people are treated with dignity, decency, and respect and believes that each individual has the right to work in a professional atmosphere that promotes equal employment opportunities and prohibits bullying and discriminatory practices, including harassment. DVLT's work environment should be characterized by mutual trust and the absence of intimidation, oppression, and exploitation. The Company strongly disapproves of and will not tolerate discrimination, harassment, or bullying of any kind. Such actions may be illegal and extremely harmful, both to the persons subjected to it and to the achievement of DVLT's goals.

DVLT also strives to provide employees with a reasonably safe work environment. Employees should help protect the safety and security of other employees, as well as DVLT's clients, vendors, other business partners, and the general public.

Americans with Disabilities Act

DVLT is committed to complying with all applicable provisions of the Americans With Disabilities Act (ADA). It is DVLT's policy not to discriminate against any qualified employee or applicant with regard to any terms or conditions of employment because of such individual's disability or perceived disability. DVLT will provide reasonable accommodations to a qualified individual with a disability who has made DVLT aware of his or her disability, provided that such accommodation does not constitute an undue hardship on DVLT.

We encourage individuals with disabilities to come forward and request reasonable accommodation. Employees with a disability who believe they need a reasonable accommodation to perform the essential functions of their job should contact DVLТ's Human Resources Department.

An employee who has questions regarding this policy or believes that he or she has been discriminated against based on a disability should notify Human Resources, the CCEO, or use DVLТ's Hotline. All such inquiries or complaints will be treated as confidentially as possible, in accordance with DVLТ's Internal Investigations Policy.

Anti-Harassment

DVLТ believes that each individual has the right to work in a professional atmosphere that promotes equal employment opportunities and prohibits discriminatory practices, including harassment. Behavior in the workplace should be professional, appropriate to the situation, and businesslike.

DVLТ strongly disapproves of and will not tolerate harassment based on sex, race, color, religion, national origin, gender, ancestry, sexual orientation, gender identification, age, disability (including HIV/AIDS), veteran status, marital status, genetic information, or any other status protected by applicable law.

Such harassment may be illegal and extremely harmful, both to the persons subjected to it and to the achievement of DVLТ's goals. DVLТ will make every effort to maintain an environment free from harassment, and to investigate thoroughly and resolve appropriately any complaint of harassment received.

Harassing behavior is unacceptable in the workplace itself and in other work-related settings such as business trips, Company meetings, Company social events, and similar situations connected with the DVLT's work.

What Constitutes Sexual Harassment?

Sexual harassment consists of unwelcome sexual advances, requests for sexual favors and other verbal, visual and physical conduct of a sexual nature whenever:

- Submission to the conduct is made either an explicit or implicit condition of employment;
- Submission to or rejection of the conduct is used as the basis for an employment decision affecting the harassed employee; or
- Harassing conduct unreasonably interferes with an employee's work performance or creates an intimidating, hostile or offensive working environment.

Sexual harassment can involve a variety of conduct. Such examples include, but are not limited to, the following:

- Unwelcome sexual advances;
- Demands for sexual contact in exchange for favorable treatment or continued employment, or threats or demands to submit to sexual requests in order to obtain or retain any employment benefit;
- Derogatory comments, slurs, insults or verbal abuse of a sexual nature, or comments of a sexual nature that are unwelcome, such as sexual invitations, sexual jokes, pranks, propositions and comments or gestures which are suggestive and/or obscene;
- Unwelcome graphic verbal commentary about an individual's body, sexual prowess or sexual deficiencies;

- Physical conduct of a sexual nature, such as touching, pinching, sexual assault or battery, coerced sexual acts, flirtations that are unwelcome, leering or whistling;
- The display of derogatory or sexual posters, photographs, cartoons or drawings or other displays in the workplace of sexually suggestive or obscene objects or pictures;
- Unwanted conduct or comments consistently targeted at only one gender, even if the content is not sexual; and/or
- Any deliberate verbal or physical conduct of a sexual nature that is sufficiently severe to interfere substantially with another person's work performance or create an intimidating, hostile or offensive work environment.

What Constitutes Harassment On the Basis of Any Other Protected Category?

Other prohibited forms of “harassment” include verbal or physical conduct that denigrates or shows hostility toward an individual because of his/her race, color, religion, sex, sexual orientation, gender identification, national origin, age, disability (including HIV/AIDS), veteran status or any other characteristic protected by law and that: (a) has the purpose or effect of creating an intimidating, hostile or offensive work environment; (b) has the purpose or effect of unreasonably interfering with an individual's work performance; and/or (c) otherwise adversely affects an individual's employment. Harassing conduct includes but is not limited to:

- Epithets, slurs or negative stereotyping based on membership in a protected category;
- Threatening, intimidating or hostile acts based on membership in a protected category;

- Written or graphic material that denigrates or shows hostility or aversion toward an individual based on membership in a protected category;
- Sending electronic messages during work time or on DVLT equipment which contain offensive material related to protected categories; and/or
- Using the Internet during work time or while using DVLT equipment to access Internet sites that contain offensive materials related to protected categories.

The prohibition against sexual or other harassment applies to everyone—managers, supervisors, salaried and hourly workers, temporary employees, customers, vendors, sub-contractors, and visitors. DVLT will not tolerate harassment of any kind by anyone.

Any representative of DVLT who is concerned or informed of concerns about the possible violation of this policy has the responsibility to report such concerns so that the Company can respond rapidly and take appropriate action. Such concerns should be reported to your supervisor, any member of Management, Human Resources, the CCEO, or using our Hotline. Employees, supervisors, and managers must report any incident of sexual or other harassment they may observe or otherwise become aware of, even if they are not the target of such harassment.

Complaints of harassment will be investigated thoroughly and quickly. Confidentiality will be maintained throughout the investigatory process, to the extent practicable under the circumstances. Whenever appropriate, disciplinary action will be taken against the harassing party, up to and including termination. DVLT will also take appropriate action to deter further harassment.

Drugs and Alcohol

DVLT is committed to maintaining a safe, healthy, and productive work environment. To protect the wellbeing of our employees, safeguard Company property, and support efficient operations, DVLT maintains a strict drug-free and alcohol-free workplace. This applies to all employees and any individual(s) performing work on behalf of DVLT.

The unlawful or unauthorized use, possession, sale, purchase, transfer, distribution, solicitation, theft, or manufacture of controlled substances (including medical marijuana), drug paraphernalia, or alcohol is strictly prohibited at all times while on DVLT premises, while conducting Company business, or while representing DVLT in any capacity—regardless of location.

Employees are also prohibited from reporting to work or working while under the influence of alcohol or any controlled substance that could impair their ability to safely and effectively perform their job duties or that could endanger the safety of others. The only exception is the use of legally prescribed medication taken according to the prescribing medical practitioner's instructions, and only when the practitioner has authorized the employee to safely report to work. This exception does not extend to recreational or medical marijuana where its use would result in impairment at work or conflict with applicable federal, state, or local law.

DVLT may require applicants and employees to undergo drug and/or alcohol testing as a condition of employment or continued employment, including before employment and at various times during employment, where appropriate. At all times, any such drug and alcohol testing by DVLT will comply with applicable federal, state, and local laws and regulations. In addition, any such

testing will be administered only in circumstances and in a manner as permitted by law, and DVLT will follow all applicable legal requirements, including any related to notice, consent, procedures, confidentiality, and employee rights. In this regard, laws governing preemployment and workplace drug and alcohol testing may vary by location. DVLT will administer its testing programs in accordance with the requirements applicable to the employee's work location.

DVLT maintains a policy of non-discrimination and will provide reasonable accommodations, as required by law, to individuals recovering from substance or alcohol dependency or those with a medical history involving treatment for substance-related conditions. However, an employee may not request reasonable accommodation to avoid or delay discipline for a violation of this policy.

Employees are encouraged to seek assistance for substance-related concerns before such issues affect their job performance or compromise workplace safety. Information regarding available treatment programs, counseling resources, or rehabilitation support can be obtained through the Employee Assistance Program (EAP) or through applicable health plan benefits.

Compliance with this policy is a condition of continued employment and violations will result in disciplinary action, up to and including immediate termination of employment. This policy does not replace or modify any applicable federal, state, or local regulations, including Department of Transportation (DOT) testing requirements or other industry-specific obligations.

Additionally, the law requires that we inform all employees whose services are directly paid for by federal grant or contract funds that they must tell us of any convictions for drug violations in the workplace within five days after the conviction. We, as the employer, must then notify the granting agency of such a conviction, and we must impose appropriate sanctions against the employee. Sanctions may range from termination of employment to satisfactory participation in a drug abuse rehabilitation program. Failure to comply with the provisions of the Act could jeopardize DVLT's eligibility for future federal contracts and/or funds.

Employee Conduct and Disciplinary Action(s)

As stated earlier, this Code provides guidelines for employee conduct. However, please keep in mind that as an DVLT employee, you are always responsible for your own conduct. This includes your behavior while traveling on company business.

DVLT will address violations of this Code and any other violations of DVLT Policies on an individual basis. Pursuant to its at-will employment policy, DVLT reserves the right to impose whatever forms of discipline it chooses in a particular instance. Disciplinary action may include an oral or written warning and/or reprimand, suspension with or without pay, demotion or termination. A negative performance evaluation will count as a written warning. There is no standard series of disciplinary steps DVLT must follow. In certain circumstances, the employee's conduct may lead to immediate discharge. Employees who have had formal written warnings are not eligible for salary increases, bonus awards, promotions or transfers during the warning period.

Employee Privacy

DVLT is committed to protecting employees from unwarranted intrusions into their personal privacy; however, as stated earlier in this Code, employees have no reasonable expectation of privacy in their use of DVLT's resources, whether those resources are equipment or devices, or the software that runs on those devices. This includes not only the email and telephone systems, but also Internet access, video equipment, copy machines, fax machines, and scanning devices.

To protect its assets, DVLT reserves the right to:

- Monitor personal communications made using Company resources;
- Monitor email accounts, text messaging, and other communications on Company resources and;
- Search personal computers or cellular phones/hand-held devices used for Company purposes.

This right to monitor and search also applies to DVLT property not located on DVLT's premises. Any monitoring and searching activities will follow applicable laws and regulations.

Equal Opportunity

DVLT is committed to supporting its mission and the communities in which it works through maintaining a diverse workforce at all levels of the organization, and through the recognition, acceptance and valuing of individual differences.

DVLT does not tolerate any form of discrimination. DVLT also does not tolerate any form of retaliation against any employee who reports a concern, makes a complaint, or assists in the investigation into any such complaint.

Toward that end, DVLT is an Equal Opportunity Employer. It is the policy of DVLT to provide equal opportunity in employment to qualified individuals without regard to race, color, religion, national origin, gender, ancestry, sexual orientation, gender identification, age, disability (including HIV/AIDS), veteran status, marital status, genetic information, or any other status protected by applicable law. This policy extends to all aspects of the employment relationship, including hiring, termination, assignment, transfer, promotion, compensation and benefits, and other terms and conditions of employment.

Employees who have concerns about diversity or discrimination in our workplace should discuss their concerns with their supervisors, any member of Management, Human Resources, DVLT's CLO, or the CCEO. Employees can also report their concerns using our Hotline.

It is DVLT's responsibility to investigate claims of discrimination, and employees are expected to cooperate with such investigations. DVLT strictly prohibits retaliation against any employee who reports a concern of discrimination or harassment and/or assists with an investigation regarding such a concern.

Information Systems and Equipment

DVLT supplies, services, office equipment and electronic communications systems (including its computers, websites, Internet connections, cell phones, handheld portable electronic communications devices, telephone and fax systems) are for DVLT's business and may not be used for personal needs, except on an incidental and occasional basis that does not interfere with an individual's job performance or otherwise violate DVLT's policies. Under no circumstance may DVLT's property or facilities be used for advertising, promotion or solicitation of business other

than for DVLT. Meetings of nonprofit and other community support activities of employees and partners may occur on DVLT premises, with the permission of employee supervisors and if they do not conflict with DVLT's business interests or location/information access requirements.

At the discretion of DVLT, cellular phones/hand-held devices may be distributed based upon business need and the amount of travel required for DVLT's business. Phone usage should remain within the average usage guidelines based on maximum minutes stated in the service plan. DVLT will not pay for additional applications ("Apps") or services without prior approval.

Any property of DVLT that has been issued to an employee for use in connection with the Company's work (including keys, computers, credit cards, cell phones, access badges, and all handheld portable electronic communication devices) must be returned to DVLT upon termination of employment.

This equipment is DVLT's property and intended for business use only. Therefore, employees cannot reasonably expect to maintain private information on these systems. In other words, all information stored on DVLT devices and systems is DVLT's property, regardless of the nature of that information, and employees should have no reasonable expectation of privacy when using such equipment. All communications using DVLT's electronic communication systems, including a record of all websites visited and e-mails sent and received, are routinely backed-up and/or stored in DVLT's computer system and may be monitored, accessed, reviewed and disclosed by DVLT.

Employees are responsible for properly handling and protecting the equipment that is issued to them and the information that is stored on that equipment. This includes taking reasonable

measures to keep the equipment safe from theft, tampering, loss, and misuse. Employees are responsible for the safety and security of all portable computing and telecommunication equipment (laptop computers, cellular phones, iPhones, etc.). Employees are also responsible for backing up all information on their laptop, to preserve all DVLТ critical information.

DVLТ’s electronic communication systems may not be used for any unlawful or improper purposes including, but not limited to, posting, copying, downloading, viewing or transmitting any material that violates the rights of others or is illegal, infringing, threatening, abusive, defamatory, sexually explicit or offensive, harassing or otherwise objectionable.

Employees are prohibited from attempting to “hack” into or otherwise breach security measures on any DVLТ electronic communications system, altering system software or hardware configurations, or from attempting to gain access to other employees’ e-mail, voice mail, or other electronic or telephonic communications without authorization.

While a limited amount of non-business use is allowed (such as personal access to the Internet), keep it minimal, and understand that proper security measures always apply. No inappropriate matter (e.g., pornography, illegal activities, defamatory material, threats, etc.) may be accessed, downloaded, stored, transmitted, or processed on DVLТ systems or equipment at any time.

Social Media Usage

DVLT supports the usage of social media by our employees, but we expect that each and every employee acts responsibly and in accordance with this Code, and DVLT's Social Media Policy.

Social media should never be a channel for retaliation, which DVLT strictly prohibits (see DVLT's Non-Retaliation Policy).

"Social Media" includes includes all means of sharing or posting information or content through virtual communities and networks, including personal blogs and websites, social networking platforms such as Facebook, TikTok, YouTube, LinkedIn, X (Twitter), Instagram, and other interactive media technologies. Common examples include, but are not limited to:

- Blogs
- Microblogging and/or Microblogging sites such as Twitter, Instagram, or Ponderous
- Multimedia and social networking sites such as Facebook, YouTube, LinkedIn or Flickr
- Forums such as Yahoo! Groups or Glassdoor
- Bookmarking sites, such as Digg or Delicious
- Wikis such as Wikipedia and any other site where text can be publicly posted
- Virtual Worlds such as Second Life

When using or engaging in social media, we recommend that you consider some simple guidelines:

- Be Honest and Accurate - Integrity is at the heart of DVLT's Code. Always communicate information or facts that are true. When giving an opinion, ensure that your opinion is clearly identified as such and not as a fact.
- Be Positive and Respectful – If you don't have something nice to say or a kind way and respectful way of saying it, think twice before you say it.
- Be Yourself – Do not impersonate someone else and do not create a link from your blog, website or other social networking site to an DVLT website without identifying yourself as an DVLT employee.
- Know Your Audience – Consider the appropriateness of your messages and/or posts, including photos, in light of whom might see them (i.e. DVLT customers, employees, competitors, etc.).
- Correct Mistakes – If you share something that is incorrect, make sure to correct or retract it. If you want to correct something someone else has said, consider doing so privately rather than in a public forum.
- Don't Make Illicit Statements – Though this should be common sense, do not make statements that are unlawful, threatening, abusive, libelous, defamatory, obscene, vulgar, hateful, pornographic, profane, racist, sexist, sexually explicit or indecent.
- Maintain Confidentiality - Maintain the confidentiality of DVLT's trade secrets and private or confidential information. Confidential information includes, but is not limited to, contracts, customer data, contract terms, customer security

arrangements, locations, and posts. Trades secrets may include information regarding the development of systems, processes, products, know-how and technology. Do not post internal reports, policies, procedures or other internal business-related confidential communications.

Timekeeping

Each employee must record accurately his or her time on a daily basis in accordance with the Company's established timekeeping Policies and Procedures. Each employee is expected to read, fully understand, and follow those Policies and Procedures. In reporting your time electronically, you are certifying that your time is being charged accurately and in accordance with those Policies and Procedures. Improperly shifting cost from one contract to another, improperly charging labor or materials, and falsifying timecards are strictly prohibited. If you have any questions or doubts regarding how to charge time or record costs, it is your responsibility to seek guidance.

Violence in the Workplace

DVLT prohibits acts or threats of violence by any employee, partner, former employee, officer, director, shareholder, client, vendor, sub-contractor, or anyone for whom the Company may be legally liable.

DVLT strongly believes that all employees should be treated with dignity and respect and does not tolerate acts or threats of violence against its employees, clients, vendors, or visitors by any individual, whether or not on DVLT's premises, at client sites, or other workplace locations.

If you see an act of violence or become aware of threats of violence, notify your supervisor or any member of management immediately. To be able to respond effectively, DVLT needs to know about such actions as soon after they occur as possible. However, **if you reasonably believe that the situation is an emergency, first contact emergency services by dialing 911**, and then notify an DVLT official.

DVLT will investigate reports of violence or threats of violence. If an employee is found to have violated this policy, he or she will be subject to disciplinary action, up to and including termination of employment and/or legal action. Employees who purposefully file a false report of workplace violence will be subject to disciplinary action and possibly termination.

Weapons

DVLT strives to provide a safe and secure workplace for employees, clients, customers and visitors. Except for security-based employees authorized to lawfully carry a firearm in connection with providing security services to the Company and who is carrying out their duties in accordance with such laws and authority, the Company has zero tolerance for, and forbids the possession of any type of weapon, firearm, explosive and/or ammunition while on Company property or conducting Company business. For purposes of this policy, Company property includes, but is not limited to, all Company facilities, Company-provided vehicles, and equipment that is either leased or owned by the Company or one of its clients.

Possession of firearms or other weapons may be cause for discipline, including, but not limited to, immediate termination of employment. In enforcing this policy, DVLT reserves the right to request inspections of any employee and their personal effects

while on Company property, to the extent allowable under applicable law. Any employee who refuses to allow a lawful inspection will be subject to disciplinary action.