

CODE OF CONDUCT

Purpose

This Code of Conduct outlines how Cordance and its subsidiaries conduct business and serves as a guiding document that outlines the ethical standards by which all in the Cordance workplace are expected to operate. It helps to define what it looks like to operate ethically, with fairness, with integrity, and in compliance with legal and regulatory requirements in the locations where we operate. Referring to this Code, and adhering to company policies, applicable laws, rules, and regulations, will guide you in making the right decisions.

Who Must Follow the Code

All employees of Cordance and its subsidiaries are required to read, understand, and follow our Code. Consultants, contractors, suppliers, temporary employees (“business partners”) who serve as an extension of Cordance are also expected to follow the spirit of our Code, as well as any applicable contractual provisions.

If you supervise our business partners, you are responsible for communicating with them about our standards and ensuring that they are understood. If a business partner fails to meet our ethics and compliance expectations or their related contractual obligations, it may result in the termination of their business relationship with Cordance.

Raising Questions & Reporting Concerns

If you have any questions or concerns regarding a section of the Code, a company policy, law, rule, or regulation, please contact the People Team at PeopleOps@cordance.co.

Our Commitment to Equal Opportunity Employment

Cordance is an equal opportunity employer. We are committed to cultivating an inclusive environment for all employees and applicants for employment. Cordance prohibits discrimination and harassment of any kind without regard to race, color, religion, age, creed, sex, nationality, ancestry, national origin, disability status, genetics, protected veteran status, affectional or sexual orientation, gender identity or expression, marital status, or any other characteristic protected by federal, state, or local laws.

ETHICAL BUSINESS CONDUCT

Cordance will conduct business honestly and ethically wherever operations are maintained. We strive to improve the quality of our services, products, and operations and will maintain a reputation for honesty, fairness, respect, responsibility, integrity, trust, and sound business judgment. Our managers and employees are expected to adhere to high standards of business and personal integrity as a representation of our business practices, at all times consistent with their duty of loyalty to the Company.

We treat our customers and business partners fairly. We work to understand and meet their needs and seek competitive advantages through superior performance, never through unethical or illegal practices. We tell the truth about our services and capabilities and never make claims that aren’t true. In short, we treat our customers and business partners as we would like to be treated. Our customers count on our promises. We must always be thoughtful, especially during sales activities, not to overcommit and to strive to ensure that customers understand the scope of what they are purchasing. We should never make

promises of additional services or capabilities as a “side deal” or promise anything that is not reflected in the customer’s purchase agreement. In all of our dealings with customers, we should think in terms of the right action for the long term to support our customer’s mission and sustain a trusted relationship.

Cordance evaluates and engages with qualified business partners on an objective basis grounded in fairness. When selecting partners, we assess their ability to satisfy our business and technical needs and requirements. All agreements are negotiated in good faith and must be fair and reasonable for both parties. Do your part to hold our business partners to our high standards and ensure they operate ethically, in compliance with the law and in a way that’s consistent with our Code, our policies, and our values. We are committed to meeting the many special legal, regulatory, and contractual requirements that apply to our government contracts in the applicable businesses.

Compliance with Laws and Regulations

Cordance is committed to compliance with all laws, rules, and regulations that apply to our business. It is impossible to anticipate every question you may have or situation you might face so, in addition to the Code, Cordance also has other resources that can be of help, including our legal team. Additional resources are listed throughout the Code. As always, we rely on you to use good judgment and to seek help when you need it.

Bribes and Gifts

All forms of bribery and other corrupt practices are strictly prohibited by Cordance, as detailed in the Company’s Anti-Corruption Policy. Simply put, we do not pay or accept bribes or kickbacks, at any time for any reason. This applies equally to any business partner of Cordance. All Company employees are required to read and comply with the Company’s Anti-Corruption Policy

A modest gift may be a thoughtful “thank you,” or a meal may offer an opportunity to discuss business. If not handled carefully, however, the exchange of gifts and entertainment could be improper or create a conflict of interest. This is especially true if an offer is extended frequently, or if the value is large enough that someone may think it is being offered in an attempt to influence a business decision. Only offer and accept gifts and entertainment that comply with our Anti-Corruption Policy and make sure that anything given or received is accurately reported in our books and records. Be aware that the rules for what we may give to – or accept from – government officials are much stricter. Don’t offer anything of value to a government official without obtaining approval, in advance, from the General Counsel. And remember: We do not accept or provide gifts, favors, or entertainment to anyone – even if it complies with our policies – if the intent is to improperly influence a decision.

In addition, our vendors must understand that they are required to operate in strict compliance with our standards and to maintain accurate records of all transactions. We never ask them to do something that we are prohibited from doing ourselves.

Modern Slavery

We conduct our business in a manner that respects the human rights and dignity of all, and we support international efforts to promote and protect human rights, including an absolute opposition to slavery and human trafficking. The Modern Slavery statement adopted by Cordance can be found [here](#). Each of us can help support efforts to eliminate abuses such as child labor, slavery, human trafficking, and forced labor.

PROMOTING A SAFE AND RESPECTFUL WORK ENVIRONMENT

Cordance endeavors to create a work environment that promotes job satisfaction, respect, responsibility, integrity, and value for all our employees, clients, customers, and other stakeholders. We all share in the responsibility of improving the quality of our work environment. We all have the right to work in an environment that is free from intimidation, harassment, bullying, and abusive conduct. Verbal or physical conduct by any employee that harasses another, disrupts another's work performance, or creates an intimidating, offensive, abusive, or hostile work environment will not be tolerated.

Workplace Bullying

Cordance will not, in any instance, tolerate bullying or abusive behavior. All employees should be treated with dignity and respect. All complaints of negative or inappropriate workplace behaviors will be taken seriously and followed through to resolution. Any individual who files a complaint in good faith will not suffer negative consequences for reporting others for inappropriate behavior. The Company defines bullying as repeated offensive, intimidating, malicious or insulting behavior that makes a person feel vulnerable, upset, humiliated, undermined, or threatened.

Workplace Violence

Cordance is committed to our employees, vendors, contractors, and the general public to provide a work environment free from violence, intimidation, and other disruptive behavior. The Company has a zero-tolerance policy regarding workplace violence and will not tolerate acts or threats of violence, harassment, intimidation, and other disruptive behavior, either physical or verbal, that occurs in the workplace or other areas where the Company's work is conducted. This includes oral or written statements, gestures, or expressions that communicate a direct or indirect threat of physical harm, damage to property, or any intentional behavior that may cause a person to feel threatened.

Drug Free Workplace

Cordance is committed to providing a safe, healthy, and productive work environment. Consistent with this commitment, it is the intent of the Company to maintain a drug and alcohol-free workplace. Being under the influence of alcohol, illegal drugs (as classified under federal, state, or local laws), or other impairing substances while on the job may pose a serious health and safety risk to others, and will not be tolerated.

Mutual Respect

Our colleagues, job applicants, and business partners are entitled to respect. We are committed to ensuring that they feel welcomed and valued and that they are given opportunities to grow, contribute, and develop with us.

- Treat others respectfully and professionally. When dealing with problems, focus the conversation on the actions and outcomes rather than the people.
- If you become aware that you may have acted in a way that others found disrespectful, offer an apology, and invite further conversation.
- Speak up about comments, jokes, or materials which others might consider offensive.

Open Door Reporting

The Company believes that most work-related problems can be best addressed through open communication with management or the People Ops Team. If you have a work-related concern, you should feel free to raise your concern with your manager as soon as possible. If you believe that your manager is not the appropriate person to talk to or you do not feel comfortable talking to your manager, you may seek out the People Ops Team, or any member of our Executive Leadership Team.

Additionally, if you believe that you or anyone else in the Company may have been subjected to unlawful harassment, discrimination, retaliation, or some other form of illegal treatment, you must promptly report the conduct to your manager or, if the conduct involves your manager or you do not feel comfortable contacting your manager, report the conduct to the People Ops Team. If you have not received a satisfactory response after reporting such conduct to your manager or the People Ops Team or you do not feel comfortable contacting either, please immediately contact a member of Cordance Executive Leadership Team.

Any manager who observes or receives a report of harassment, discrimination, retaliation, or other illegal conduct must report the conduct to the People Ops Team, or a member of the Executive Leadership Team promptly so that an investigation can be conducted, and corrective action taken, if appropriate.

We will promptly and thoroughly investigate any claim and take appropriate action where we find a claim has merit. To the extent possible, we will retain the confidentiality of those who report suspected or alleged violations of discrimination and/or harassment policies

Non-Retaliation

The Company is committed to providing and maintaining a productive work environment that is characterized by mutual respect and is free from any type of retaliation. We believe every employee should be free to ask questions, raise concerns and make complaints about conduct the employee believes is improper, illegal, unfair, unethical, retaliatory, harassing, or discriminatory. Consistent with this commitment, the Company will not tolerate retaliation against individuals who engage in Protected Activity.

Protected Activity includes, but is not limited to:

- Good faith opposition to discrimination, harassment, retaliation, or another practice believed to be unlawful or in violation of Company policy by the employee;
- Good faith filing of a complaint regarding discrimination, harassment, retaliation, or any other practice believed to be unlawful or in violation of Company policy by the employee, whether filed internally or with a government agency;
- Good faith participation in an employment discrimination, harassment, or retaliation investigation or proceeding, even if the proceeding involved claims that were found to be invalid;
- Requesting a reasonable accommodation based on religion or disability; and
- The exercise of any legally protected right under any other applicable law. Individuals who have a close association with someone who has engaged in such Protected Activity may also be protected under this policy.

PROTECTING INFORMATION AND ASSETS

The confidentiality of the trade secrets, proprietary information, and similar confidential, commercially-sensitive information (i.e. financial or sales records/reports, marketing or business strategies/plans, product development, customer lists, patents, trademarks, etc.) about the Company or its operations, or that of our customers or partners, is to be treated with discretion and only disseminated on a need-to-know basis (see policies relating to confidentiality).

Intellectual Property

Examples of intellectual property (IP) include:

- Business and marketing plans
- Company initiatives (existing, planned, proposed, or developing)
- Customer lists
- Trade secrets and discoveries
- Methods, know-how, and techniques
- Innovations and designs
- Systems, software, and technology, including source code
- Patents, trademarks, and copyrights

Cordance commits substantial resources to technology development and innovation, and the creation and protection of our intellectual property rights are critical to our business.

If you have any questions about IP, please reach out to legal@Cordance.co

Information about competitors is a valuable asset in today's competitive business environment, but in collecting business intelligence, you and others working on our behalf, must always live up to the highest ethical standards. Obtain competitive information only through legal and ethical means, never through fraud, misrepresentation, deception, or the use of technology to "spy" on others. Sharing competitively sensitive information with competitors (whether that information belongs to us or our business partners) is always prohibited.

Financial Integrity

The accuracy and completeness of our disclosures and business records are essential to making informed decisions and supporting investors, regulators, and others. Our books and records must accurately and fairly reflect our transactions in sufficient detail and in accordance with our accounting practices and policies. Some employees have special responsibilities in this area, but all of us contribute to the process of recording business results or maintaining records. Ensure that the information we record is accurate, timely, complete, and maintained in a manner that is consistent with our internal controls, disclosure controls, and legal obligations.

Conflicts of Interest

A conflict of interest can occur whenever you have a competing interest or activity that may interfere with your ability to make an objective decision on behalf of Cordance. Each of us is expected to use good judgment and avoid situations that can lead to even the appearance of a conflict, because the perception of a conflict can undermine the trust others place in us and damage our reputation. Conflicts of interest may be actual, potential, or even just a matter of perception. Since these situations are not always clear-cut, you need to fully disclose them to your manager so that they can be properly evaluated, monitored, and managed.

RESPONSIBLE COMMUNICATIONS

Communications About the Company

At Cordance, we are committed to maintaining transparent and accurate internal and public communication about the organization. Information regarding the company will be shared through official channels to maintain consistency. Unauthorized employees should not speak on behalf of the company and should instead refer any communications with media, investors, or other members of the public to the Executive Leadership Team.

Employees of Cordance may be asked to give public speeches, write articles for professional journals, or otherwise communicate about Cordance in a public forum. Please seek approval from management before engaging in these activities while employed by Cordance.

Employees who participate in social media activities such as LinkedIn, blog posting, online discussion groups, or other electronic communications may not, even under an alias, speak on behalf of Cordance, reveal confidential or proprietary information, or post information that may negatively impact the image or reputation of Cordance.

Upholding the Code

Violating our Code of Conduct, our policies, or the law is unacceptable and will not be tolerated. Anyone who violates the Code will be subject to disciplinary action, up to and including termination of their employment with Cordance.