Code of Business Conduct
A Message from Leadership

When each of us joined E3/Sentinel, we didn’t simply take a job. We made a commitment to help our customers protect and serve our nation. Our Homeland Security, Defense, Intelligence, and Federal Civilian customers keep us safe, preserve our freedoms, and deliver the broad range of essential services our Federal Government provides—often putting their own safety at risk to do so.

Because E3/Sentinel provides our customers with mission-critical support, serving our fellow citizens is our mission too. It is essential for everyone at E3/Sentinel to understand and appreciate that it is not only an honor and a privilege to help men and women in public service serve our nation; it is also a tremendous responsibility. For these reasons, we have developed a Code of Conduct that recognizes we owe our customers—and each other—the very highest standards of ethical behavior and conduct.

Our Code of Conduct is framed around our Three Commitments. Our first Commitment is to always put our customers’ missions first.

Our second Commitment is to our Core Values—the set of principles that should guide all our actions at E3/Sentinel. Our Core Values are designed to both drive business results through a commitment to excellence and individual accountability, and to create a respectful and collaborative business environment where everyone can do their best work and grow professionally. Our third Commitment recognizes that, as a government services business, we operate in a highly regulated industry. For us, compliance with these rules and regulations is not simply a bureaucratic exercise; it is a core part of our business.

Ultimately, our Code of Conduct is about creating a business that we can all be proud of. A business that not only succeeds and grows, but that every day helps our Federal Government customers serve our fellow Americans. And a business where each of us can keep learning, develop professionally, and do work that truly matters. To achieve these goals, it is essential that we all hold ourselves, and each other, accountable for upholding our Code of Conduct.

Andy

Andy Maner
Chief Executive Officer
E3/Sentinel
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Our Code of Conduct

Because we support the critical missions of Federal Government customers, E3/Sentinel’s Code of Conduct emphasizes our special responsibilities to always behave ethically, appropriately, and legally when supporting our federal customers. Specifically, our Code of Conduct is organized around our Three Commitments:

Commitment to our Customers’ Mission

E3/Sentinel is not a generic business with generic customers. We help our Federal Government customers protect and serve our fellow Americans. For this reason, our customers’ missions must always come first. This means everyone at E3/Sentinel should:

- In our daily business activities, always think first of the effects of our actions on our clients’ missions, rather than about our short-term business interests.
- Focus on building service offerings and technology solutions that address our customers hardest mission challenges and requirements.
Commitment to Our Core Values

Our actions should always be informed by our five core values described below:

**Excellence**

Achieving **Excellence** in everything we do. We strive to deliver an extraordinary experience for our clients, partners and employees. This includes:

- A relentless focus on delivering high quality services and superior results to our customers;
- Hiring, training, and promoting individuals who both demonstrate expertise and support our Core Values;
- Ensuring our services and solutions always improve mission outcomes for our Federal Government customers;
- Always learning and improving, as individuals and as a company.

**Accountability**

Demanding **Accountability** as individuals and as a company. This includes:

- Taking responsibility for our actions, in good times and bad;
- Maintaining high levels of personal conduct both on the job and, when our behavior could reflect on E3/Sentinel or our customers (e.g. on social media), outside of business hours;
- Taking ownership, at all levels of our organization, for the quality of the services we provide our customers and for our business outcomes;
- Following all E3/Sentinel’s policies and all applicable laws and regulations;
- Protecting the privacy and personal information of our colleagues, our partners and our customers.
Commitment to Our Core Values Cont.

Community
Creating a Community that fosters trusting, respectful, and an inclusive environment. This includes:

- Supporting diversity and inclusion;
- Contributing to a healthy, safe and respectful workplace;
- Ensuring our workplace is free of unwelcome, harassing or offensive remarks or behavior;
- Upholding our responsibilities to each other to speak up, without fear of retaliation, if you witness disrespectful or inappropriate behavior;
- Seeking out opportunities to help and support colleagues in need and to give back to our communities;
- Maintaining a culture of merits-based employment decisions and non-discrimination.

Integrity
Maintaining Integrity in all aspects of our business. This includes:

- Always doing the right thing, even when no one is watching;
- Acknowledging that our individual actions reflect on both E3/Sentinel and our federal government clients and acting accordingly;
- Safeguarding – and NEVER misusing – the confidential information of our customers, partners, and fellow E3/Sentinel colleagues;
- Protecting the trade secrets and intellectual property of both E3/Sentinel and our partners and customers;
- Always competing fairly;
- Speaking up, without fear of retaliation, if we ever witness fraudulent, unethical or illegal behavior.

Humility
Demonstrating Humility with our customers and each other. This includes:

- Always respecting our Federal Government customers and never forgetting that our mission is to support their missions;
- Remaining open to new ideas and striving for intellectual honesty when seeking the best solutions to complex customer problems;
- Demonstrating respect for our customers, partners, and colleagues by maintaining appropriate professional behavior and appearance.
Commitment to Compliance

As a Federal Government-focused business, we are in a highly regulated industry. For this reason, compliance is not merely a bureaucratic exercise; it is a fundamental part of our business. It is critical that we comply with all of the many laws, regulations, and policies that apply to our business. E3/Sentinel’s Employee Handbook sets our corporate policies and provides specific guidance for compliance.

Our commitment to compliance, includes:

- Complying with internal reviews, external investigations, and external reporting procedures;
- Avoiding actual or perceived conflicts of interest;
- Maintaining accurate personnel and timekeeping records;
- Ensuring accuracy in our billing and invoicing practices;
- Abiding by all relevant rules, regulations and policies regarding the confidentiality of data we receive from customers, partners, or E3/Sentinel colleagues;
- In our contracting and procurement activities, following all aspects of the Federal Acquisition Regulation (FAR), the Procurement Integrity Act (PIA) and the False Claims Act (FCA).
- Following all relevant health and safety regulations whether at an E3/Sentinel facility or on-site with a client;
- Conforming to E3/Sentinel's drug and alcohol policy, which prohibits the use of illegal and/or inappropriate use of drugs or alcohol;
- A zero-tolerance policy for violence, harassment, discrimination, or weapons in the workplace;
- Maintaining a culture that supports and protects anyone who witnesses and reports fraud, waste, abuse, or any other allegation of misconduct;
- Promoting a diverse and vibrant merit-based workforce without regard to race, national origin, gender, LGBTQ+ status, age, disability status, military status and to uphold all federal, state and local laws that protect employees from discrimination.
- Complying with applicable Equal Opportunity Act/Affirmative Action-related laws and rules, as well as all applicable federal, state and local, wage laws.
Reporting Options

Any E3/Sentinel employee who witnesses behavior that violates our Code of Conduct, or any other kind of misconduct, should inform their supervisor and/or their E3/Sentinel HR Business Partner. We also provide a third-party reporting hotline for employees to anonymously report any fraud, compliance, ethics or human resources related incidents:

📞 Ethics and Compliance Hotline: 844-380-0005

💻 Web: lighthouse-services.com/e3federal