



Code of Business Ethics & Conduct

Version 2026.01.28

Minburn Code of Business Ethics and Conduct

The Code of Business Ethics and Conduct (“Code”) is an integral part of Minburn’s Compliance Program and reflects the way in which Minburn conducts all business transactions. The Code applies to our employees, and certain suppliers, subcontractors and consultants pursuant to contract terms. The purpose of the Code is to ensure that we comply with Minburn’s core principles (Honesty and Service in all business transactions) as well as with applicable rules, regulations and laws that govern our activities in the jurisdictions and legal environments in which we operate. This summary sets forth a clear set of expectations for these individuals.

CARING ABOUT OUR PEOPLE AND OUR CUSTOMERS

People are the most important resource at Minburn. Our employees may come from varied cultural, economic, ethnic and religious backgrounds, representing all ages, genders, races and orientations. We strive to treat our people fairly and with respect and we believe workforce diversity is an important objective in its own right and is a source of competitive advantage. We respect and appreciate our customers — we listen to them, we work hard for them, we are honest with them, and we communicate freely and openly with them. If there is a problem, we are committed to its prompt resolution.

ETHICAL BEHAVIOR

Minburn aspires to always do the right thing. High ethical standards should be part of our everyday work, and adherence to such standards should never be traded for financial or other business objectives. Before we make any decision, we should ask ourselves, “Is it legal? Is it the right thing to do? Is it fair to all concerned? Is it in the best interests of our company and clients?” and “Is it able to withstand the scrutiny of outside parties?” If the answer to any of these questions is no, we refrain from making such decision and evaluate the circumstances as appropriate with senior management.

Anyone whose behavior is found to violate this Code and/or our ethical standards will be subject to corrective action, which for employees may be up to and including termination and for suppliers or subcontractors may be up to and including removal from any project work with Minburn (“Corrective Action”).

Everyone is entitled to work in an environment free of verbal, physical and sexual harassment. Each of us should treat everyone whom we encounter with personal dignity and respect — no matter what their background, circumstances, role or responsibility.

Each of us must take all steps to avoid, prevent, and detect actual or potential conflict of interest situations while working for or with Minburn. As a general rule, employees, suppliers, and subcontractor personnel are expected to notify appropriate Minburn personnel in the event their personal or business relationships or financial interests may impair his/her ability to

represent the best interests of the Minburn project and the customer. Personnel assigned to work on Minburn projects may be required to complete a conflicts of interest questionnaire on a periodic basis. If you have any interest, direct or indirect, in any supplier, customer, competitor or consultant, or subcontractor of Minburn, you should make prompt disclosure (preferably in writing) to management.

FINANCIAL RESPONSIBILITY

Company books and records pertaining to Minburn projects must be kept in accordance with generally accepted accounting principles, government regulatory requirements, and established finance and accounting policies. Minburn is committed to accurate, transparent and timely billing for all deliverables and services provided to commercial clients, government agencies, or other third-party payors. Minburn will bill only for products and services provided, directly or under contract, and in accordance with company policies and procedures. Your submission of a timecard, travel or other reimbursement request, vendor invoice, or invoice to a customer reflects your representation that such information is complete and accurate to the best of your knowledge. Anyone making a false statement on any bill or claim form will be subject to Corrective Action.

Documents and other records pertaining to Minburn projects must be retained in accordance with the requirements of the law, governing contracts and Minburn's records management policy. Documents that are in any way related to a preservation order/litigation hold or ongoing or anticipated investigation of Minburn or circumstances related to a Minburn project by any government agency or law enforcement must be protected and cannot be destroyed unless the preservation order/litigation hold notice is lifted.

To ensure that we live up to our ideals we are reminded that each of us have certain duties and responsibilities:

- Everyone is expected to comply with applicable laws and regulations and to be alert to potential violations of US law, including but not limited to the prohibitions against Contingency Fees, the Anti-Kickback Act, the Foreign Corrupt Practices Act, as well as other international laws and conventions against corruption, and the local laws of the countries in which we operate.
- Each of us is responsible for ensuring parties with whom we contract obtain and maintain all required operating and business licenses and permits, as well as all applicable certifications and accreditations.
- Everyone should protect Minburn's confidential information against improper use or improper disclosure to third parties.
- Everyone is obligated to report to Minburn all suspected violations of the Code and any law or regulations applicable to Minburn's business activities.
- Everyone is required to cooperate with investigations of potential non-compliance with these standards.

- Everyone should seek immediate advice from Minburn's Managing Member and/or COO whenever there is a question concerning compliance with any rule, regulation, or law.

Reporting Non-Compliance.

Minburn requests that all employees report fraud, violations of law, or other violations of this Code. Reports may be made 24 hours a day, seven days a week. Reports will be investigated promptly, with due respect for the rights and privacy of all who may be involved in such an investigation. Employees who make such reports in good faith will be protected from retaliation.

EMPLOYEE ACKNOWLEDGEMENT

I am in receipt of the Minburn Code of Business Ethics and Conduct. I have read and understood these documents, and I have been given the opportunity to ask questions or seek clarification from:

- Tony Colangelo, Minburn Managing Member, 703-626-0284
- Matt Koehl, Chief Operating Officer, 202-904-3382
- Stuart Harding, Vice President, Contracts & Programs, 540-683-1801

Employee Name: _____

Date: _____

Signature: _____