A FOUNDATION OF INTEGRITY:
Our Leidos Code of Conduct

We’re all in this together.
Our Commitment to Our Communities

- Comply with All Applicable Anti-Corruption Laws and Regulations
- Compete Fairly
- Participate in the Political Process Responsibly
- Conduct Business Fairly and Honestly
- Adhere to Honesty in Science
- Respect Human Rights
- Follow International Trade Compliance and Sanctions Rules

Our Commitment to Our Colleagues

- Maintain a Respectful Workplace
- Promote a Safe and Healthy Workplace

Our Commitment to Our Customers

- Honor Our Customer Obligations
- Provide Fair and Accurate Billing
- Protect Customer Resources and Data
- Protect Confidential and Proprietary Information
- Protect Against Insider Threats

Waiver

WE...
Message from the Chairman and Chief Executive Officer

Colleagues,

The history of Leidos is one of innovation anchored in integrity. Our diverse and talented employees have created a culture that allows us to be successful while preserving and maintaining a focus on trust and transparency with our fellow employees, customers, external partners, and shareholders.

Our Leidos Code of Conduct (our Code) guides us in sustaining this strong ethical culture, and it is a foundational resource for us in our day-to-day roles as Leidos employees. It is essential that we all read our Code, reflect on how it should guide our behavior, and ask questions about anything that we do not understand.

At Leidos, we lead by example, and we are all responsible for upholding the standards established in our Code. We do not cut corners on ethics, quality or safety in pursuit of our business objectives, and we do not tolerate misconduct. We are all accountable. This means that we must all speak up when we have a question or concern. Our Code discusses several reporting options; make sure you are familiar with the resources available to you, and do not hesitate to use them if you need to seek answers or report misconduct. Leidos does not tolerate retaliation against those who report concerns. If you experience retaliation, you should report it, and those who engage in retaliation will be subject to discipline.

Thank you for reading our Code and sustaining our ethical culture at Leidos. We are a better company because of your efforts.

Roger Krone
Chairman and Chief Executive Officer
Our Values

**Integrity**
is having the courage to make tough ethical decisions, taking pride in our work, being transparent with our team, and being respectful of everyone.

**Inclusion**
is fostering a sense of belonging, welcoming all perspectives and contributions, and providing equal access to opportunities and resources for everyone.

**Innovation**
is not limited to our engineers and scientists. It is being a catalyst. Being tenacious and curious to help us excel and be a part of a learning organization.

**Agility**
is being flexible, creative, and resilient. It is our ability to think and act small while using the size and strength of our balance sheet to our advantage.

**Collaboration**
is being team-oriented and proactively engaging to meet shared objectives. It is about building relationships and staying connected with each other.

**Commitment**
is being accountable, taking ownership, modeling servant leadership, and operating with a sense of urgency to our customers and teams.
Our Commitment to Our Code
We Know Our Code and Our Role

Our Leidos Code of Conduct (our Code) is a foundational resource we must all use to ensure that our decisions and actions are consistent with our values, our policies, and the law. Our Code provides information on some of the risks we may encounter in our work for Leidos and suggests appropriate resources to use when questions or concerns arise. Our Code applies to every employee, and we must all be familiar with the topics it covers.

While our Code cannot anticipate every situation we might face, a strong understanding of both our core values and the policy and behavior expectations set forth within our Code will enable us to successfully navigate any compliance challenges. We must approach challenges with a focus on integrity and ask ourselves some important questions:

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<tr>
<th>Is this legal?</th>
<th>Is this consistent with our values?</th>
<th>Does this comply with our Code and policies?</th>
<th>Would I want this to be made public?</th>
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If you can’t answer “yes,” you should examine why your answers are “no” or why you don’t know the answer. Remember there are resources available to guide you, and when you are unsure about a course of action, you can always ask your manager, consult this Code, refer to our policies, contact the Ethics and Compliance Office, or call the Leidos Hotline at 855-753-4367.
We are bound not only by our Code, policies, and values. We must also be aware of and comply with all applicable laws and regulations that relate to our roles and responsibilities. Violations of our Code, our policies, or the law may result in disciplinary action, up to and including termination. If you have any questions about the laws and regulations that apply to your role or responsibilities, or if you are unsure if any laws or regulations might apply, contact the Ethics and Compliance Office.

When making decisions and taking action in our roles at Leidos, we must always:

- Act with integrity towards Leidos, each other, customers, and third parties
- Foster a respectful, safe, and healthy work environment
- Speak up and ask questions
- Report misconduct

REMEMBER

OUR CODE is not the only compliance resource we have, so all employees must also be familiar with the policies and processes that govern their roles and responsibilities at Leidos. A complete list of applicable policies can be found on the Command Media page on Prism.
We Ask Questions and Report Concerns

You should feel comfortable speaking up and encouraging others to do the same when you have questions or concerns about violations or suspected violations of our Code, our policies, or the law. If you are uncomfortable coming forward, you have the option of reporting a concern anonymously.

When your role includes work for federal agencies, you have special reporting responsibilities. If you become aware of or suspect a violation of the Federal Acquisition Regulation (FAR), Defense Federal Acquisition Regulation Supplement (DFARS), U.S. Privacy Act, Federal Trade Commission Act (FTC Act), Health Insurance Portability and Accounting Act (HIPAA), Fair Credit Reporting Act (FCRA), any applicable privacy law or regulation, or any other regulation, you must report it immediately. Leidos supports those who report concerns and does not tolerate retaliation. Employees who prefer to file a complaint directly with the relevant agency’s Office of Inspector General pursuant to the whistleblower provisions in the FAR and DFARS can always do so. Violations or suspected violations can also be reported directly to the Department of Defense (DoD) by calling the DoD Hotline at 800-424-9098. Individuals may make such reports without fear of reprisal. For further information on whistleblowing and relevant rules, contact the Ethics and Compliance Office.

When you need to seek guidance or report a concern, you have many options available to you:

- Your supervisor or other individuals in your management chain
- Your Group Ethics Director, the Director of Investigations, or the Chief Ethics and Compliance Officer
- Your local Human Resources representative, the Workforce Solutions Director, or the Chief Human Resources Officer
- Any member of the Employee Ethics Council
- The Leidos Hotline, which connects you to an independent third-party provider. You may contact the Hotline by phone or by online submission. Concerns may be reported anonymously.
- International Hotline numbers are available on the Ethics and Compliance page on Prism.
- Our General Counsel, Chief Security Officer or Chief Privacy Officer (for violations of any Leidos policy or notice related to the protection of Personal Information, such as Leidos’ Data Privacy policy, or any applicable data privacy laws or regulations)
- Our Chairman and CEO
- Our Board of Directors via the Lead Director of the Leidos Board of Directors, the Corporate Governance and Ethics Committee Chair or the Audit and Finance Committee Chair
TRINA IS A MANAGER who supervises several people, including Stephan. One afternoon, Stephan tells Trina that he feels like he has been harassed by some of his co-workers. Because Stephan was vague about the details of the events and who did what, Trina decides to investigate the situation herself to find out more information before she reports the issue. Is Trina right?

ANSWER

No. Trina should immediately report the information to the Ethics and Compliance Office or one of the other reporting options in this Code and follow up with Stephan to let him know the investigative process has started.
We Follow Our Investigative Process

All employees must cooperate fully with any investigation, audit, corrective action, or other official request. This is required whether the investigation is internal to Leidos or, in the case of government audits and investigations, conducted by authorized representatives of the government (e.g., investigators, agents, or attorneys).

When government representatives request information or documents in the possession of the company, those requests must be coordinated with the Legal Department before any response is provided.

When we conduct an investigation:

- We investigate each allegation to determine whether an actual violation was committed.
- The investigation is conducted confidentially to the extent possible.
- The investigation is independent and objective.
- When a case is substantiated, an independent quality assurance team reviews and approves the recommended corrective and disciplinary actions.
- Upon finding a violation of an applicable law or regulation, the company makes a timely disclosure in writing to the appropriate outside parties.

We Recognize Managers Have a Special Role

Managers have a special role in our Ethics and Compliance program at Leidos. They are often the first point of contact when employees have a question or concern, so managers must encourage communication, educate themselves on our compliance resources and processes, and be prepared to escalate concerns when necessary. Managers must also model ethical behavior and embody our values.

Managers should speak up when they have concerns. They are required to report any violation or suspected violation of our Code, our policies, or the law to the Ethics and Compliance Office as soon as possible. Violations or suspected violations of any Leidos policy or notice related to the protection of Personal Information, such as our Data Privacy policy, or any applicable data privacy laws or regulations, must be reported to the Global Privacy Office as soon as possible.

Organization leaders, group presidents, chief financial officers, controllers, and certain functional area leads must certify quarterly that they are not aware of any violation or suspected violation involving our Code or company policies that has not been reported to the Ethics and Compliance Office.
GEMMA IS WORKING ON A NEW PROJECT with a government agency at the agency’s site. Part of our project agreement with the customer requires Leidos employees to properly log out of the agency’s systems when taking any breaks. Yesterday, Gemma noticed a member of the team leaving without logging out. She doesn’t want to get her co-worker in trouble if he didn’t mean to do anything wrong, and he did come right back, so she’s not sure that violates our rules. What should she do?

Even if Gemma is not positive that what she saw was a violation, she must report her concern immediately. By making a report in good faith, Gemma is helping us build a secure workplace. If you think you know of a problem at one of our worksite locations, speak up as soon as possible. If Gemma experiences retaliation for making an honest report, those involved will be subject to discipline.
We Do Not Tolerate Retaliation

Leidos has zero tolerance for retaliation of any kind. Those who engage in retaliation will face disciplinary action, up to and including termination of employment. Anyone who asks questions or reports concerns in good faith will be protected.

If you are concerned about retaliation or believe that you or others have been subject to retaliation, you should immediately contact the Chief Ethics and Compliance Officer, the General Counsel, or the Chief Human Resources Officer.

TAKE NOTE

A GOOD FAITH report is based on the reporter’s honest belief that the information relayed in association with a concern is true.

RETALIATION can include any negative job-related action, such as demotion, discipline, firing, salary reduction, exclusion from projects or meetings, or job or shift reassignment. It can also include other behaviors meant to punish someone for speaking up or cooperating with an investigation.
Our Commitment to Our Company
We Avoid Conflicts of Interest

Being transparent and respectful of our team and our company means doing everything we can to avoid conflicts of interest and disclosing any issues as soon as they become apparent. We must also avoid any appearance of a conflict and address all potential conflict issues. The decisions you make in your role at Leidos must be impartial, and you must put the needs of the company above any personal interests.

AVOIDING BUSINESS CONFLICTS

We cannot allow any personal activity or business to conflict, or appear to conflict, with our responsibilities to the company. We owe Leidos our best efforts, and we cannot allow obligations to outside business activities or other personal activities to impact our responsibilities to the company.

Our obligations to the company extend to the procurement process. To ensure its integrity, employees may not be involved in a procurement if there is a possible conflict, such as when a potential supplier is a relative of or has a close personal relationship with an employee.

AVOIDING FAMILIAL CONFLICTS

Our team is diverse and made up of talented people who have been selected to collaborate with us on our mission because of their performance and not because of their family connections or relationships with Leidos employees. To prevent potential conflict situations, an employee is not permitted to hire or have a direct or indirect reporting relationship with a closely related individual as defined by our Staffing policy.

AVOIDING OUTSIDE ACTIVITY CONFLICTS

From time to time, you may consider participating in activities with outside organizations. Sometimes these activities might involve our customers, including government customers, our suppliers, and our competitors. These activities can create conflicts of interest or the appearance of a conflict. You must be transparent about these relationships, and if you have an outside opportunity, such as serving on a federal advisory board or running for political office, you must obtain approval from your manager and the Ethics and Compliance Office before participating in the activity. Please also refer to our policy.

AVOIDING OUTSIDE WORK CONFLICTS

Outside work that could potentially conflict with your role at Leidos requires prior approval. You must avoid outside work that could appear to conflict with your role until you have fully disclosed the situation and received guidance and approval from your manager and the Ethics and Compliance Office. If you have questions about any outside business or work opportunity, such as an offer to work for a customer, competitor, or supplier, speak with your manager and the Ethics and Compliance Office. Please also refer to our Personal Conflict of Interest Request Review and Approval Process.

For further guidance, employees should talk to their manager or the Ethics and Compliance Office, and refer to our Standards of Business Ethics and Conduct policy and Commercial Procurement resources.

TAKE NOTE

A CONFLICT OF INTEREST can arise when an individual’s personal interests interfere, or appear to interfere, with the interests of Leidos.
AVOIDING CONFLICTS REGARDING GIFTS
Giving and receiving gifts can create the perception of a conflict and potentially compromise our decision-making or the decision-making of our partners. Our government customers and often our suppliers have strict prohibitions on receiving gifts, so to ensure we do not create even the appearance of a conflict, we do not give gifts to customers nor accept any gifts from suppliers except as permitted by our policy.

AVOIDING ORGANIZATIONAL CONFLICTS
You should also seek to avoid actual and potential organizational conflicts of interest (OCI). An OCI can arise when Leidos is unable or potentially unable to render impartial assistance or advice to the Government, its objectivity in performing a Government contract is or might be otherwise impaired, or it has access to source selection information or non-public information relating to its competitors. A contracting officer’s determination that Leidos has an actual or potential OCI could result in, among other things, Leidos being excluded from competing for certain contracts or being disqualified from receiving an award of a particular contract.

Be cautious when:

- Potential work includes tasks where Leidos would provide systems engineering and technical direction, prepare specifications or work statements, or obtain access to non-public third-party proprietary information or source selection information.
- We would be setting or influencing the requirements or terms for a future opportunity on which Leidos might have an interest in bidding.
- We would be evaluating or recommending our own products and services or those of our competitors.

When any of these scenarios are present, or if you have any questions about a potential OCI, work with your Contracts Team and Legal Representative to evaluate and address the actual or potential OCI.

AVOIDING RECRUITMENT CONFLICTS
We are required to comply with all applicable laws and regulations when engaging in employment discussions and hiring current and former U.S. government employees. We do not discuss, even informally, potential employment at Leidos with current U.S. government employees, including military personnel, unless those government employees either have disqualified themselves from any involvement in Leidos contracts or matters or have received an explicit waiver from their agency.

Our commitment to ensuring recruitment integrity continues even after leaving the company. While employed by Leidos and for one year thereafter, Leidos employees must not solicit or attempt to solicit any other employees to leave their employment with Leidos. Please refer to our Staffing policy or your Proprietary Information, Inventions, and Non-Solicitation Agreement (PIIN) if you have questions.

REMEMBER
CONFLICTS OF INTEREST can be difficult to spot and negotiate.
Be sure to speak up and ask questions when you are confronted with a potential conflict.
FRANCES, A LEIDOS PROJECT MANAGER, assisted a federal agency with drafting the statement of work for an upcoming procurement, known as “INSCOPE.” A short time after the contract was completed, the agency issued a solicitation for the INSCOPE program, and it included the statement of work that Leidos personnel, including Frances, prepared. The project is not that large, and Frances believes that the company’s past performance will likely enhance its relationship with this key customer. Leidos intends to submit an offer in response to the solicitation. Is this an actual or potential OCI?

ANSWER

Yes. Even if the contract would enhance Leidos’ relationship with a key customer, a contracting officer would have a reasonable basis to determine that Leidos gained an unfair competitive advantage as a result of having drafted the statement of work for the government. Upon becoming aware of the potential for an OCI, Frances should have contacted the Contracts Department and Legal to seek ways to avoid, mitigate, or neutralize the potential conflict.
We Keep Accurate Records

Ownership and transparency guide our business activities. This includes how we record and manage information for Leidos. We must always comply with the provisions of Leidos policies and procedures, applicable laws, regulations and contractual requirements. All employees should know and comply with the rules related to the documents and records they create, access, or are responsible for in their role. Employees must review on a regular basis those records in their possession or control, including electronic records that are either stored on computer hard drives or saved to a shared network resource, and securely delete or otherwise securely dispose of those records that are no longer required to be retained to meet statutory, regulatory, contractual, policy or business requirements.

Employees should refer to Leidos’ Records Retention policy and the Leidos Security Standard Practice and Procedure (SPP). Never hide, alter, or falsify any record for any reason.

WE REPORT ACCURATELY

Those of us responsible for properly submitting financial information and disclosures, or reports for government or public disclosure or for regulatory review, must take care to follow all company rules and procedures. We provide accurate, timely, and complete information to our finance and administrative functions, adhere to all systems of internal controls, and support all information security policies and practices.

WE KEEP ACCURATE TIME RECORDS

Everyone must also keep a complete and accurate daily record of time spent by task. It is important that our labor costs are accurate, and there can be serious penalties for both Leidos and the employee if there are inaccuracies. Those who review timesheets must question any discrepancies they discover. If you have questions, refer to our Time-charging policy.

REMEMBER

ALL OF OUR REPORTING AND RECORD-KEEPING shall accurately reflect our business activities and always be aligned with our accounting and record-keeping processes and the law.

WE RECORD AND REPORT EXPENSES ACCURATELY

Business expenses are also business records, and the same care with which we compile all of Leidos’ business information should be taken with expense reporting. We must always accurately and completely record expenses and ensure they are appropriately classified and allocated to the correct codes for reimbursement (e.g., allowable, unallowable). If you have questions, refer to our Travel and Expense policy.

WE SPEAK UP IF WE KNOW OF INACCURATE OR FALSE RECORDS OR REPORTING

You should come forward if you have concerns pertaining to questionable accounting, financial reporting, timekeeping, expense reporting, auditing matters or cybersecurity practices. We comply with the law and applicable contract requirements, and are required to maintain accurate books and records. If anyone, including your supervisor, instructs you to make an inaccurate record or report, you should speak up immediately and communicate your concerns to the Chief Financial Officer, Corporate Controller, Legal Department, or any of the various reporting options in our Code. If you believe a misrepresentation has been made related to adherence to cybersecurity requirements in connection with government contracts or proposals, a cybersecurity or data privacy incident was not monitored or reported as required by applicable laws, regulations, or contract provisions, or that Leidos is providing products or services to the Government with cybersecurity deficiencies, you shall immediately report those concerns to the Legal Department or the Chief Ethics & Compliance Officer.

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We Protect Our Assets

Part of being a dynamic organization and responding to business challenges with agility is using our resources carefully. We must all protect our organizational assets and be vigilant custodians of the assets of our customers and others as well.

The hard work we put into developing our products, services, and technologies must also be protected. Everyone must be careful to avoid disclosing any company confidential or proprietary information to unauthorized persons. Leidos’ confidential and proprietary information may only be disclosed to a third party under an applicable obligation of confidentiality, such as a non-disclosure or other similar agreement, and/or with appropriate management approval.

Our commitment to keeping this information safe and secure doesn’t end even when our employment with Leidos does. Be aware that any intellectual property (IP) we create during the course of our employment, including patents, copyrights, trademarks, trade secrets, and proprietary information, is the property of Leidos.

Although employees may have personal or pre-existing IP created outside of their Leidos employment, no such outside or pre-existing IP may be brought to Leidos, disclosed to Leidos personnel or Leidos customers, or incorporated into a Leidos work product without prior written approval of the Legal Department.
We Protect Privacy and Confidentiality

At the core of everything we do is our unwavering commitment to integrity. We respect individuals’ privacy rights. We comply with applicable (i) data privacy and data protection laws, rules, and regulations as well as (ii) Leidos internal and public-facing privacy statements, notices, policies and procedures. We also adhere to applicable privacy and data protection-related contractual obligations.

What does this mean on a day-to-day basis? It means that:

- You should access **Personal Information** only when needed for legitimate business purposes, use only the minimum required, and disclose such information only to those who need it to perform their job duties.
- **Personal Information** may only be transferred to or shared with approved third parties with whom Leidos has a contractual relationship, such as suppliers, customers, prime contractors and subcontractors. Such sharing is subject to (i) Leidos privacy policies and notices, including our **Data Privacy policy**, (ii) applicable laws, regulations and industry standards (iii) applicable contractual obligations. You must read and understand our **Data Privacy policy**, the Leidos public-facing **Privacy Statement** and all applicable contractual obligations prior to collecting, transferring or sharing **Personal Information**.
- Be particularly careful and, if needed, seek guidance from the **Global Privacy Office** when accessing, viewing, transmitting or otherwise handling **Sensitive Personal Information**, including **Protected Health Information (PHI)**. As with **Personal Information**, you must limit your use, access, transmission, and disclosure of **Sensitive Personal Information**. You must also use appropriate security measures to protect **Personal Information** and **Sensitive Personal Information**.
- Protect the privacy and security of the **Personal Information** which relates to your colleagues, in addition to Leidos’ former employees, job applicants, customers, potential customers, suppliers, contractors, subcontractors, and website visitors.
  - The Leidos **Global Employee Privacy Notice** describes how Leidos generally collects and uses Employment-Related Information during and after an employment relationship with Leidos.
  - If you need to report an actual or suspected data security or data loss incident, or if you are unsure whether you are required to do so, please contact your manager, the **Leidos IT Service Desk**, or your **Business Information Security Officer (BISO)**. Please direct any questions about a potential compromise or loss of **Personal Information** to your BISO and the **Global Privacy Office**.

*TAKE NOTE*

At Leidos, **PERSONAL INFORMATION** means any information or data that can be used to identify an individual, either on its own or in combination with other information. At Leidos we use that term as an "umbrella” term to include **AU (Australia) Personal Information**, **CA (California) Personal Information**, **EU Personal Data**, **UK Personal Data** and **Personally Identifiable Information (PII)**. **Sensitive Personal Information (SPI)** is a subset of Personal Information that includes PHI and other information considered to be especially confidential. In some jurisdictions, before collecting, handling or sharing SPI, we must meet additional requirements (e.g., provide notice and obtain consent).

Please see the **GPO Glossary of Privacy and Data Protection Terms**, Leidos’ **Data Privacy policy**, **Global Employee Privacy Notice** and **Privacy Statement** for more information.
Greta has recently left Leidos to work for another organization. She is going through her files at home and finds several project files that include notes, memos, and other project materials. She knows that she probably isn’t supposed to have this information anymore, so she puts it in the dumpster behind her apartment. Is this okay?

**No.** Greta still has a duty to keep any potentially confidential or proprietary information of Leidos and its customers safe even after she leaves the company. While she is right to want to ensure she no longer has possession of these materials, simply throwing them in the trash doesn’t meet her continuing obligation to protect the information.

She should contact Leidos and make arrangements to promptly return the materials.
We Keep Data Secure

Keeping our data secure is a key part of demonstrating our commitment to our customers and to each other. We comply with all Leidos information system security policies. Under the provisions of Leidos’ Acceptable Use of Leidos Information Systems policy, it is the responsibility of all Leidos employees, its wholly owned subsidiaries, and affiliated personnel with sponsored access to Leidos information systems (hereinafter referred to as “users”) and/or any systems managed by Leidos and/or its subsidiaries (e.g., government furnished equipment or customer furnished equipment) to comply with this policy in order to protect Leidos against information security incidents. Events such as loss or theft of IT assets, unauthorized access to systems, or improper modification or destruction of data can result in consequences such as financial loss, liability, or non-compliance with laws and regulations. If a user does not follow this policy, it may result in disciplinary action, up to and including termination of employment. We must also know who our BISO is so that we can seek guidance on data security when we need it and report concerns and data security issues should they occur. If you are unsure who to contact, refer to this list of resources on Prism or contact the Chief Information Security Officer (CISO), and/or Vice President of Cybersecurity Risk Management.

Remember that Leidos’ information systems are authorized only for unclassified and official business use. All Leidos systems must be operated in accordance with Leidos’ Acceptable Use of Leidos Information Systems policy. We must all protect all data and assets under our control and ensure that all information is stored, processed, and communicated securely. Leidos’ Media Protection policy establishes the baseline technical security requirements, procedural controls, and associated responsibilities for the use of all Leidos owned or managed Leidos media on Leidos owned or managed systems as well as non-owned and managed systems.

When we transmit certain types of Protection-Required Data (PRD) (including but not limited to Sensitive Personal Information, International Traffic in Arms Regulations (ITAR)/export-controlled information, DoD Covered Defense Information, and Controlled Unclassified Information), it must be encrypted. ITAR/export-controlled information may only be accessed by U.S. persons (see We Follow International Trade and Sanctions Rules in this Code for further information).

You must immediately speak up and report policy violations, thefts, and actual, suspected, or potential cybersecurity incidents and data spills to the IT Service Desk, your BISO and your supervisor. If you are unsure who to contact, refer to the resources on Prism or contact the Global Privacy Office.

If you choose to remain anonymous when making a report, please contact the Leidos Hotline at 855-753-4367.

RENEE MANAGES A LARGE AMOUNT OF PROPRIETARY AND CONFIDENTIAL DATA about project specifications and contractual obligations. The nature of her work requires her to travel frequently, and she maintains productivity by working while traveling. As her schedule becomes busier, Renee finds herself working with confidential information about customers and projects while at the airport and riding the train. Is Renee complying with our policies about handling our sensitive information?

No. While it may be tempting to conduct work while commuting, it’s important to understand that airports, trains, and other open areas are not private. In other words, our work should not be done in every location, and you should use discretion when choosing work locations. Others may see a vital piece of confidential information or view private data on our laptops or other electronic devices. In this instance, Renee must take steps to limit the information she accesses in this way. She must wait until she is in a private location and securely connected to the Leidos network through the Enterprise VPN or another network access option before working on sensitive documents. By taking these steps, we protect sensitive data and maintain our customers’ trust.
We Protect Inside Information

As a Leidos employee, you may have access to or come into possession of material, non-public information (“Inside Information”) about Leidos, our customers, vendors, suppliers and other companies that conduct business with us. Inside Information is information that is not yet widely disclosed to the general public, but if it were, it would likely affect the market price of the securities issued by a company (ours or any other, including private companies that issue publicly traded financial instruments) or be considered important to a reasonable investor in deciding to buy or sell those securities.

As an employee:

- You must not buy or sell any Leidos securities if you have access or come into possession of Inside Information concerning Leidos.
- You must not trade in securities of any other companies, such as Leidos’ customers, vendors, suppliers or other business partners, when you have Inside Information concerning these other companies that you obtained in the course of your relationship with Leidos.
- You must not communicate Inside Information learned or developed through your association with Leidos to any other person, including family members, friends or business or social acquaintances (commonly referred to as “tipping”), and may not make any recommendations or express any opinions about trading in Leidos or another business partner’s securities on the basis of such information. This prohibition applies whether or not you receive any benefit from the other person’s use of that information.

Trading in securities while you have Inside Information, or telling others about it which allows them to trade in Leidos securities, could be a violation of the law and lead to serious fines and penalties.

If you have any questions please refer to our Insider Trading policy or contact the Legal Department.

TAKE NOTE

What is INSIDE INFORMATION? It is information that has not been publicly announced or otherwise disseminated (such as through a press release) that a reasonable investor would expect to affect the market price of the securities issued by a company (ours or any other, including private companies that issue publicly traded financial instruments) or be considered important to a reasonable investor in deciding to buy or sell those securities. It is also called “material non-public information.”

QUESTION

DIEGO IS VERY EXCITED ABOUT A NEW PROJECT he is starting with one of our prime contractor customers. The customer, which is also a publicly traded company, has developed a new method that will revolutionize its products and services. The new information hasn’t been released by the customer to the public yet. Diego tells his brother-in-law, who he knows is interested in the industry, about the new method. Since this isn’t information about Leidos, and Diego isn’t trading any of the customer’s stock, is this okay?

ANSWER

No. Even if Diego doesn’t trade the stock himself, letting someone else know, or “tipping,” is a violation of our policy and may violate the law, which can lead to serious consequences for Diego.
We Communicate Responsibly

Leidos employees are powerful brand ambassadors. We are passionate about the work we do and naturally want to share it with others. But in order to protect our company’s reputation, we must think carefully before communicating to the public. Ask yourself if what you are about to communicate reflects the Leidos vision and values.

Try your best to exercise good judgment and common sense. Do not disclose any information about Leidos or its customers that has not already been approved for external release. A good rule of thumb is to ask yourself whether the information has already been shared publicly through our official communications channels, such as our company website and social media accounts. When in doubt, do not post the information.

While you may be approached by reporters, bloggers, or other influencers, only authorized employees may speak officially on behalf of the company. Any employee who receives a media inquiry should pass the information along to our Strategic Communications team immediately. Unless you are authorized, you should not engage with reporters, not even with a response like “no comment.”

For more information on how to be an effective brand ambassador, please review our Communications Procedures and Rules for Use of Social Media, or contact the Leidos Communications team.

REMEMBER

If you choose to participate in social media, think before you post and use it responsibly.

Some good guidelines for posting or contributing on social media include:

☑️ Be careful about what you write because it will be public, possibly forever.

☑️ Be sure it is clear you are speaking for yourself and not our company.

☑️ Do not engage in harassment or disclose confidential, private, or proprietary information online, doing so would violate our Code and policies.

☑️ Don’t overshare – be vigilant when adding contacts online or conversing with those you do not know in person.

We Avoid Misconduct Outside the Workplace

The company’s reputation and brand are among its most valuable assets. Leidos employees are expected to conduct themselves in a manner that reflects positively on the company’s image and identity. Leidos employees who engage in off-duty criminal behavior or other misconduct that impairs work performance, diminishes or undermines the company’s reputation or business interests, or exposes the company to adverse publicity may be subject to disciplinary action, up to and including termination of employment.
BELLA HAS WORKED FOR LEIDOS for several years and knows a lot about the company. Recently, a Facebook friend of hers posted an article about us online, and Bella was quick to respond with her opinions and refute a few of the points the article made, citing her experience and knowledge of our company. Speaking on behalf of Leidos is not one of her job responsibilities. Is this okay?

No. Bella should not be speaking on behalf of Leidos or divulging information online that might be sensitive or confidential. If she identifies herself online as a Leidos employee, she should also make clear that any opinions or ideas she posts are her own—not those of our company. It does not matter if Bella’s comments are positive; taking a stance on issues related to our company or making comments about our business is not permitted under our Communications policy.
Our Commitment to Our Colleagues
We Maintain a Respectful Workplace

Collaboration and innovation only happen when we work together as a team. Key to a successful team is a work environment of respect and inclusion. We must all do what we can to create and maintain a safe and healthy environment free of discrimination or harassment of any kind. Preventing any unwelcome or inappropriate conduct by all employees, managers, supervisors, and affiliated personnel or non-employees is our goal.

Leidos does not allow anyone to subject employees to harassment, including sexual harassment, in the workplace, and we do not tolerate any conduct contributing to an intimidating, hostile, or offensive atmosphere, nor retaliation based on rejecting or reporting the harassing conduct.

What makes a RESPECTFUL WORK ENVIRONMENT? We do. Our shared workspace has to be a place of mutual respect and consideration, and you should ask yourself if your behavior in the workspace is contributing to a positive, respectful atmosphere.

TAKE NOTE

HARASSMENT can include, but is not limited to, any unsolicited and unwelcome, threatening, or offensive communication or conduct (including touching, staring, or overtures) as well as bullying. Harassment can be verbal, physical, or written.

SEXUAL HARASSMENT can include, but is not limited to, unwelcome advances, requests for sexual favors, or any other visual, verbal, or physical conduct that is explicitly or implicitly tied to employment or employment decisions, unreasonably interferes with work performance, or creates an environment that is intimidating, hostile, or offensive.
If you are subject to harassing conduct or believe someone else is the subject of harassing conduct, you should immediately report the issue to your manager or one of the resources listed in our Code. Further information can be found in the Harassment-Free Workplace procedure.

Diversity is also a key component of our collaboration efforts. We know that we are stronger when we provide an inclusive environment of varied viewpoints and talents where our employees are respected and can thrive.

Leidos is committed to equal employment opportunity. If you have any questions, please refer to our Equal Employment Opportunity and Non-Discrimination procedure. Issues of harassment and discrimination are serious, and you should speak up and ask questions when you are confronted with a potential issue.
SIMONE IS A HUMAN RESOURCES MANAGER responsible for hiring at her local facility, and she has interviewed several capable applicants for a new job. She is deciding between a male and a female finalist. The female applicant is pregnant. Simone is concerned about this applicant needing time off and possibly being less committed to the job. Since the finalists have similar qualifications, is it a problem if Simone decides to offer the job to the non-pregnant applicant because of her concerns about the female applicant needing time off or possibly being less committed to the job?

Yes. It is a violation of our policy to base employment decisions on a legally protected characteristic such as gender, medical condition, or pregnancy.
We Promote a Safe and Healthy Workplace

We can’t work as an agile team and meet our commitments if our efforts are threatened or compromised by unsafe conditions or behaviors, substance abuse, or other unacceptable conduct. We can thrive and succeed only when we build and maintain a safe work environment for everyone.

A number of environmental, health, and safety (EH&S) laws and regulations apply to our business activities worldwide and we are committed to conducting business in a manner that protects the health and safety of our employees, customers, business partners, community, neighbors, and the environment. Leidos works to incorporate leading EH&S practices into our products and services, and we strive to improve sustainability through conservation, pollution prevention, waste reduction, and recycling.

A safe workplace is a workplace free of threats and violence. Leidos prohibits the following from all of our facilities and workplaces:

- Firearms
- Other weapons
- Explosives or pyrotechnic devices (fireworks)
- Incendiary devices
- Other items used to inflict bodily harm
SAFETY ON THE JOB MEANS LOOKING OUT FOR HAZARDS, minimizing risks, and performing our activities in accordance with established EH&S procedures and training. We all have a responsibility to understand and meet these requirements as identified in the Corporate EH&S Program Manual, in any respective location- or contract-specific EH&S program, or in our EH&S Policy. If you have a question or concern about workplace environment, health, and safety, please contact your supervisor or a member of the EH&S Department.

Leidos maintains a drug-free workplace where the use, sale, possession, or exchange of illegal drugs is strictly forbidden along with the abuse of alcohol. This prohibition includes any prescription drugs other than those legally prescribed to the individual in possession. Leidos employees and affiliated personnel are subject to drug screening and/or periodic testing (including a fitness-for-duty examination). If you have any questions, please refer to our Drug-Free Workplace procedure.

In addition, due to the sensitive nature of our work, and our commitment to keep our information and our customers’ information secure, we do not allow the following items in our workplace without prior approval from the Chief Security Officer:

- Cameras
- Radio transmitting devices
- Recording devices
- Surveillance equipment

While use of cellular telephones or other electronic devices equipped with a camera or recording feature is allowed, the use of the camera or recording features on these devices is prohibited without approval from the facility security officer or senior business manager.

Concerns related to employee safety are taken very seriously and should be immediately reported to your manager or the EH&S Department. We should all speak up when confronted with safety concerns. Report security concerns to your manager or the Security Operations Center at 855-663-5343. You can also call the Leidos Hotline at 855-753-4367.

Imminent threats of violence should be immediately reported to law enforcement. If you have any questions about these subjects, please refer to our Workplace Environment policy.
Our Commitment to Our Customers
We Honor Our Customer Obligations

As a contractor, and particularly as a government contractor, we fully honor our obligations. We do not substitute inadequate, alternate products, services, or staff for those contractually specified. Nor do we avoid or falsify required testing or verification requirements. Our progress reports and contract deliverables are accurate and complete as required.

We Provide Fair and Accurate Billing

We record accurate accounts of our time and resources on each project we work on for every customer and make sure that all invoicing accurately reflects the work we have done or the terms and conditions we have agreed to. We take care to ensure that we do not record such time and resources in error or otherwise create any inaccuracies. If you are unsure about how to record information for customer billing, or have any questions regarding customer billing, you should contact your manager or the finance department and refer to our Finance and Accounting policy.

We Protect Customer Resources and Data

We are vigilant keepers of all customer resources and proprietary data in our care, custody, or control. When handling our customers’ assets and proprietary data, we adhere to all customer or applicable contractual requirements and follow the same standards and procedures used in handling our own assets and proprietary data. See We Protect Our Assets, We Keep Data Secure, and We Protect Privacy and Confidentiality.

Leidos employees must never intentionally violate the confidentiality, privacy, or IP rights of others. Even if someone reveals third-party proprietary data or an individual’s Personal Information to you, if you know or suspect it is confidential or proprietary and the person disclosing it did not have the right to do so, you must not use or disclose it, and you must report any disclosure to your manager or another resource listed in our Code.

We also do not use or distribute in an unauthorized manner any third-party copyrighted materials. If you have questions about the use of such materials, refer to our Intellectual Property policy or contact your Contracts POC or the Legal Department.
SALLY IS WORKING WITH A NEW CUSTOMER who has provided her with the business files of a competitor that worked with the customer previously. The files appear to contain some proprietary process information that might be helpful in our future work. Since Sally didn’t take this information, or even ask for it, is it okay for her to review it or use it?

No. Sally should neither review the information nor forward it to anyone, and she should inform her manager immediately. We wouldn’t want a current or former customer sharing our proprietary information with a competitor, and our IP policy requires us to be respectful of others’ proprietary information and intellectual property rights.
We Protect Confidential and Proprietary Information

We do not use any confidential or proprietary information we learn in our role at Leidos to benefit ourselves financially in any way. We cannot start a business or enter into any financial arrangement that involves the direct or indirect use of proprietary information from Leidos, our partners, our customers, or other third parties.

Note that when we are working with outside parties and exchanging any confidential or proprietary information, we should have a non-disclosure agreement (NDA) or similar agreement in place with that other party. If you have questions about when to use an NDA or similar agreement, please contact your Contracts POC or the Legal Department.

We Protect Against Insider Threats

Organizations like Leidos that perform classified government work are legally required to implement monitoring programs to help detect, deter, and mitigate any insider threats. Leidos has established an Insider Risk Management Program (IRMP) which is designed to identify potential insider threat activity and mitigate the following types of risks to our workplace:

- Theft and misuse of IP
- Theft of other assets
- Sabotage
- Fraud
- Espionage
- Other workplace disruptions

All cleared and non-cleared employees and other personnel working on Leidos’ behalf are covered by the IRMP, subject to applicable U.S., global, and local laws and regulations.

If you suspect any improper insider activity or have a question about the IRMP, please discuss it immediately with your manager or one of the other resources listed in our Code.
Our Commitment to Our Communities
We Comply with All Applicable Anti-Corruption Laws and Regulations

We do not engage in bribery or corrupt activity. We adhere to the U.S. Foreign Corrupt Practices Act, U.K. Bribery Act, and UN OECD Anti-Bribery Convention. We must not give, promise, offer, or authorize anything of value to any government official or commercial partner that influences any action, or that violates any duty owed by the official or partner to his or her employer, in order to gain an improper advantage for purposes of obtaining or retaining business for Leidos or any other person. In addition, we must not retain a third party to engage in such activity on our behalf.

Further, unwritten agreements, amendments to agreements or side-agreements with international intermediary third parties are strictly prohibited. We contract and conduct our business in a transparent manner that complies with Leidos policies, procedures and all applicable laws and regulations.

We do not solicit or accept kickbacks from any parties, including our customers, vendors, or subcontractors. Even in difficult circumstances, we hold ourselves accountable, remember our commitment to each other, and demonstrate the courage and integrity to refuse to participate in corrupt activity.

We ensure a system of strict financial and accounting controls. We do not accept false or unusual invoices. Cash payments are prohibited unless they are in strict compliance with Leidos policy and procedure.

We conduct due diligence on all our international intermediaries to ensure our partners are ethical, candid and experienced experts who are qualified to perform work on behalf of Leidos.

We must never provide a facilitation payment (i.e. “grease payment”), which may include anything of value provided to a government official to expedite a routine, non-discretionary service (e.g. slipping money to an official to quickly clear a shipment or process a visa).

We do not provide improper hospitality. All hospitality must be supported by sound and ethical professional justification, and free from even the perception that favorable treatment is sought, received, or given in exchange for the hospitality.

We act in accordance with all of our ethics policies and procedures wherever we operate.

Please refer to our International Anti-Corruption policy and International Anti-Corruption Compliance Plan for further information or guidance. You can also contact the Corporate International Regulatory Compliance Office or another resource listed in this Code if you have concerns.

JOSEPHINE RECEIVES AN INVOICE for warehouse services that is multiple times greater than the going market rate for warehousing in the region. The service provider is demanding payment and threatening to withhold services and delivery to a customer should we not pay it, which could adversely impact the company’s contract obligations. Should Josephine simply pay the invoice to help ensure we meet customer commitments?

No. Josephine should not pay the invoice as it clearly implicates corrupt activity and constitutes an unreasonable and highly unusual invoice that violates company policy. Josephine should report the matter.

**TAKENOTE**

**ANYTHING OF VALUE** is very broad and can include money, fees, commissions, credit, cash equivalents (such as gift cards), gifts, favors, food, entertainment, a promise of employment, and other opportunities.

**GOVERNMENT OFFICIAL** includes an official, employee, or person acting on behalf of a government department or agency, a government-controlled organization or entity, a political party, an international organization, and employees of or persons acting on behalf of a government official. A family member of a government official must also be treated as a government official for purposes of international anti-corruption laws.
We Compete Fairly

Leidos is successful because of our agility and innovation, as well as our strict adherence to our principles of integrity. We do not cheat to win at business, and we engage in fair and open competition. We comply with all applicable laws, and we do not conspire with competitors or potential competitors to:

- Fix prices or coordinate bids
- Divide customers, markets, or territories, or products
- Limit the production or sale of products
- Boycott suppliers or customers

Predatory or exclusionary conduct that is intended to harm competition is prohibited. Please refer to our policy for further guidance. If you have any questions regarding competition laws, please consult the Legal Department.

We Participate in the Political Process Responsibly

Our Government Affairs Compliance Handbook describes how Leidos participates in the political process. Under federal law, Leidos is prohibited from making direct political contributions in connection with federal elections. In jurisdictions with "pay-to-play" laws, all contributions, including personal contributions and contributions by certain family members, must be approved and disclosed in accordance with Leidos policy. Additionally, while Leidos encourages employees to engage in the political process, you must obtain approval from the Government Affairs Committee via the Outside Activity Request approval process before running for any political office or accepting an appointment to any government office.

Through our Government Affairs Office, Leidos maintains a legally permissible Political Action Committee (PAC). All political activity using corporate funds—including contributions to state and local politicians, the use of Leidos facilities, and any fundraising activity—must be pre-approved by the Government Affairs Committee. Our work can bring us into close collaboration with public officials and specific reporting requirements apply to employees who visit Capitol Hill for lobbying activities. If you are engaged in those relationships or activities, you must familiarize yourself with applicable laws and policy requirements regarding gifts and lobbying, including procurement lobbying laws and appropriate time charging practices. Coordinate with the Government Affairs Office to ensure proper disclosure. If you have any questions about what is allowable and how to proceed, you should refer to our Government Affairs Compliance Handbook and contact our Government Affairs Office.
We Conduct Business Fairly and Honestly

We’re competitive. Taking on challenges and showing strong commitment and tenacity is how we conduct our work. But that should never lead to compromising our values or cutting corners.

We perform our work as contracted and in compliance with all specifications, requirements, and conditions. We do not cut corners on quality, testing, or resources.

During the procurement process, we must abide by all of the provisions of the Procurement Integrity Act, which generally prohibits the following:

- Knowingly obtaining—other than as provided by law, bid, proposal, or source-selection—information related to an ongoing federal procurement
- Disclosing such information to unauthorized persons
- Engaging in employment discussions with, employing, or providing compensation to certain current or former government procurement or contract officials

We also seek to avoid any appearance of an unfair competitive advantage arising from the use of former government employees who had access to competitively sensitive non-public information relating to specific procurements by firewalling those personnel from all proposal development activities relating to those procurements.

Please refer to our policy if you have questions.

We Adhere to Honesty in Science

We embrace the expression of honest differences in interpretations or judgment of data necessary for scientific advancement. However, you must be careful about the representations you make on behalf of the company to ensure that you never engage in any scientific misconduct. Misconduct can include fabrication, falsification, plagiarism, or other practices that deviate from those that are commonly accepted within the scientific and technical community for proposing, conducting, or reporting research, or for generally conducting our business. You must report any suspected instances of “misconduct in science” to your manager, the Legal Department, or one of the other resources listed here in our Code.
We Respect Human Rights

Our success is based on collaboration and the strength we find in our commonality and diversity. We embrace different cultures, customs, races, and religions, as well as political institutions and all applicable laws in our operations. Our mission and our values reflect an unwavering respect for human dignity and fundamental human rights.

We condemn human rights abuses and support the United Nations (UN) Guiding Principles on Business and Human Rights. We have a responsibility to respect human rights in the operation of our business, and we adhere to the UN framework to protect and respect human rights and to remedy human rights abuses. We also expect everyone with whom we conduct business to observe similar standards respecting human rights.

We Follow International Trade Compliance and Sanctions Rules

Leidos has operations around the world, and we must be aware of all the international trade compliance rules that might apply to the work we do. These rules include trade and sanction laws and regulations that can be complex, and the business activities and parties they cover can change quickly. If your job responsibilities involve international activity in any way—such as the export, re-export, import, or transfer of products, services, or information—then you must be aware of applicable regulations as well as Leidos’ internal policies and procedures that cover that activity. You should know that the provision of products, services, information or Customs activities to foreign persons anywhere in the world, including the U.S. and any other country where you perform work, could require prior authorization from the country in which you are operating, including the U.S. Departments of State or Commerce. Violations can result in substantial civil and criminal penalties for both Leidos and individual employees, including debarment from future government work, loss of contracts, substantial fines, and jail time for individuals.

We do not engage in business with parties that are restricted under applicable sanctions laws and regulations. We screen prospective customers and business partners against government restricted and denied party listings and require our partners to do the same.

Our trade compliance program includes the following resources:

- The Corporate International Regulatory Compliance Office in the Office of the General Counsel oversees trade compliance throughout the company.
- Group international trade managers are responsible for day-to-day compliance and assistance to their assigned line organizations.
- The Corporate International Regulatory Compliance page provides specific compliance guidance and direction to Leidos employees.

Refer to Leidos’ Compliance with Export, Import, and Sanctions policy or International Trade Compliance Plan for further information or guidance. You can also contact the Legal Department and speak up if you have any concerns.

To further these goals and reinforce human rights, Leidos has implemented policies to:

- Support the health, wellness, and safety of our employees
- Foster an inclusive work environment that is free from harassment and discrimination
- Combat human trafficking and the use of forced labor
- Prevent the use in our products of “conflict minerals” that benefit armed groups in covered countries
- Promote integrity and fairness in our relationships with employees, customers, and suppliers
- Protect the environment
- Support our communities
QUESTION

SONDRA HAS JUST RECEIVED A REQUEST from a foreign government customer to return its equipment to a service provider in a foreign country in which the customer is operating. Failure to return the equipment in a timely fashion could adversely impact our customer contract obligations. Sondra knows that the equipment requires an export license and also knows that an export license exists that covers the customer. Should Sondra return the equipment?

ANSWER

Absolutely not. Both Sondra and Leidos could face significant penalties for violating the laws and regulations surrounding exporting. Sondra must coordinate with an International Trade Manager to confirm the country and service provider are authorized under the license scope. All license scopes are limited to the parties, countries, and end-use identified in the license. For more information, consult Trade Compliance resources.
Waiver

Only the Board of Directors or its Corporate Governance and Ethics Committee may waive our Code of Conduct for executive officers.
When you need to seek guidance or report a concern, you have many options available to you:

- Your supervisor or other individuals in your management chain
- Your Group Ethics Director, the Director of Investigations, or the Chief Ethics and Compliance Officer
- Your local Human Resources representative, the Workforce Solutions Director, or the Chief Human Resources Officer
- Any member of the Employee Ethics Council
- The Leidos Hotline, which connects you to an independent third-party provider. You may contact the Hotline by phone or by online submission. Concerns may be reported anonymously.
- International Hotline numbers are available on the Ethics and Compliance page on Prism
- Our General Counsel, Chief Security Officer or Chief Privacy Officer (for violations of the Leidos Privacy Policy or any applicable data privacy laws or regulations)
- Our Chairman and CEO
- Our Board of Directors via the Lead Director of the Leidos Board of Directors, the Corporate Governance and Ethics Committee Chair or the Audit and Finance Committee Chair

REMEMBER

INDIVIDUALS MAY REPORT CONCERNS BY USING ANY OF THE REPORTING OPTIONS LISTED IN THIS CODE.

Concerns may also be reported by emailing the Leidos Ethics and Compliance Office at hotline@leidos.com or by calling 571-526-7200. You may choose to make a report by identifying yourself or remaining anonymous.