



TABLE OF CONTENTS

- I. HONEST, ETHICAL, AND FAIR CONDUCT**
 - 1. Improper Use or Theft of Company Resources**
 - 2. Use of Company Technology**
 - 3. Conflicts of Interest**
 - 4. Reimbursement for Political Contribution**
- II. COMPLIANCE WITH LAWS**
 - 1. EQUAL OPPORTUNITY EMPLOYMENT; DISCRIMINATION AND HARASSMENT POLICY**
 - 2. FAIR COMPETITION AND ANTITRUST POLICY**
 - 3. GIFTS, BRIBES, AND KICKBACKS**
 - 4. INTERNATIONAL BUSINESS TRANSACTIONS**
 - A. FOREIGN CORRUPT PRACTICES ACT**
 - B. EXPORT CONTROLS**
 - C. ANTI-BOYCOTT CONTROLS**
 - D. U.S. SANCTIONS POLICY**
- III. ENVIRONMENTAL, HEALTH, AND SAFETY**
 - 1. COMPLIANCE WITH EHS POLICIES**
 - 2. SUBSTANCE ABUSE**
- IV. CONFIDENTIAL INFORMATION**
- V. ADMINISTRATION OF POLICY**
 - 1. PROCEDURE FOR CONFIDENTIAL SUBMISSION OF INFORMATION, QUESTIONS, OR CONCERNS**
 - 2. NO RETALIATION**
 - 3. REVIEW AND INVESTIGATION**
- VI. ADDITIONAL RESOURCES**
 - 1. POLICIES AND REFERENCES**
- VII. EMPLOYEE CERTIFICATION & COMPLIANCE STATEMENT**

Code of Ethics & Business Conduct

This Policy applies to Strike, LLC and its subsidiaries, affiliates, employees, and offices world-wide (the “Company” or “Strike”). The Company is committed to the highest ethical standards and to conducting its business with the utmost integrity. The Company’s business and reputation depend on the conduct of its directors, officers, and employees. The Board of Directors of the Company (the “Board”) has adopted this Code of Ethics and Business Conduct (the “Code”) to: (i) promote honest and ethical conduct; (ii) provide for full, fair, and timely disclosure; (iii) promote compliance with applicable governmental laws, rules, and regulations; (iv) deter wrongdoing and disreputable behavior; and (v) provide accountability and encourage prompt internal reporting of any violations of the Code.

I. HONEST, ETHICAL, AND FAIR CONDUCT:

Each Company employee, officer, and director is required to adhere to the highest ethical standards and must not be dishonest in dealing with each other, with clients, customers, vendors, and all other persons.

All employees, officers, and directors must also respect the rights of fellow employees and third parties. Employee, officer, and director actions must be free from discrimination, libel, slander, and harassment.

Misconduct will not be excused because it was directed or requested by another. All employees, officers, directors, and anyone acting on behalf of the Company are expected to alert management whenever an illegal, dishonest, or unethical act is discovered or suspected. Employees, officers, and directors will never be penalized solely for reporting, in good faith, discoveries or suspicions. Employees are asked to contact the Human Resources Director or General Counsel with any questions relating to the Code or the best course of action in a particular situation.

Improper Use or Theft of Company Resources

The Company’s resources include, among other things, its employees, materials, equipment, software, computers, supplies, computers, confidential information, the proprietary business, and technical information of the Company and of third parties in the Company’s possession, and the time of the Company’s employees.

Every employee has responsibility to see that the Company’s resources are efficiently put to their intended uses and are protected against theft, waste, misapplication, and misutilization. Every employee, officer, and director must safeguard Company resources from loss or theft and may not take Company resources for personal use. All employees, officers, and directors must appropriately secure all Company resources within their control to prevent their unauthorized use. Using Company computers or communications systems to distribute personal or “non-business related” information, data, or graphics is strictly prohibited. In addition, the following principles shall apply:

- Employees who receive the Company’s proprietary business, financial, and technical information in trust are expected to maintain such information in confidence and not to disclose it to others or use it other than for the Company’s benefit. All such information is the sole and exclusive property of the Company. This information includes, but is not limited to, names of actual or prospective customers and suppliers, descriptions of services, business or engineering processes and any related equipment, facilities layout, engineering drawings, systems software, business plans, financial and marketing information, costs, projections, budgets, and all documents and data that relate to such items.
- Inventions and ideas relating to the Company’s business or developed during the course of or in connection with employment by the Company belong to the Company and should not otherwise be used

or commercialized by employees. Upon request by the Company, employees will take all steps required to protect such inventions and ideas (e.g., applying for patent protection) and to assign or transfer the rights to the Company.

- Access to and use of Company resources is only permitted for valid Company purposes. Employees should report any misuse or misappropriation of Company assets to their immediate superior or to the Company's Legal Department.
- Commitments of Company resources may be made only in accordance with management's general or specific authorization. Supervisors should ensure that their subordinates clearly understand their responsibilities and the extent of their authority. Employees must secure the proper authorization before executing any transaction.
- Upon termination of employment for any reason, each employee shall immediately return to the Company all resources and property of the Company, including copies, used by the employee during employment or otherwise in the employees' possession or control or to which the employee has access.

Use of Company Technology

The Company provides to its employees a variety of Information Systems, which include, but are not limited to, on-site and off-site laptops/workstations, cellular devices, and tablets linked to the Company's Information Systems, hardware, software, voicemail, and e-mail systems, internet access capability, databases, data networks, and any other software packages. The following guidelines shall apply to employees, contractors, sub-consultants, or others connected to and using Company Information Systems:

- The Company's Information Systems are the Company's property and are provided to employees for the purpose of conducting Company business. Any personal use is prohibited.
- The Company endeavors to maintain the proper licenses for all software on all Company Information Systems. No employee shall maintain on his or her Company issued Information System any software that is not licensed to the Company, and no employee shall install Company-licensed software on any personal (non-Company) Information System. If an employee is unsure whether a software package is licensed, he or she should check with the Company's Information Technology Director.
- No employee shall illegally download or copy materials protected by federal, state, local, or international copyright law, including but not limited to software, videos, music, images, and documents.
- The Company's Information Systems may not be used to display, download, store, transmit, or otherwise disseminate any materials (verbal, graphic, or otherwise) that could reasonably offend someone on the basis of race, color, sex, age, religion, gender, national origin, ethnicity, disability, sexual orientation, or any other characteristic protected by law or Company policies.
- All materials on Company Information Systems, including e-mails and voicemails, are the property of the Company, and no employee shall have an expectation of privacy with respect to such materials, including e-mails and voicemails, either sent or received. The Company has the right to access and/or monitor use of Company computers, including e-mails, voicemails, and Internet access, at any time.
- Internal and external e-mail communications made by Company employees using Company Information System and/or on Company business should only be for legitimate Company business purposes. Use of

the Company's Information Systems for non-business purposes such as, but not limited to, the dissemination of chain letters, "spam" messages, or messages that a reasonable person may deem to be abusive, obscene, pornographic, defamatory, harassing, vulgar, threatening, or malicious may not only violate this Code, but also the Company's employment and other policies and may subject an employee to discipline up to and including termination.

- Internal and external e-mail communications using either Company Information System and/or on Company business are the sole property of the Company and may constitute official records of the Company's business transactions and business conduct. All e-mail communications should be drafted with the same thought and care as other Company correspondence, reports, or memoranda.
- No employee shall share the proprietary information of the Company or any of the Company's clients via the e-mail or Internet unless the disclosure is necessary for business purposes.

Conflicts of Interest

The Company expects its employees, officers, and directors to perform their respective duties using their best impartial judgment in all matters affecting the Company. All employees, officers, and directors must avoid any personal activity, investment, or association that would interfere, or that could appear to interfere, with good and objective judgment concerning the Company's best interests. Employees, officers, and directors may not exploit their position or relationship with the Company for personal gain and should avoid even the appearance of such a conflict.

The Company requires that employees avoid conflicts of interest, wherever possible, except under guidelines explicitly defined by the Company's Legal Department and approved by the Board. Anything that would be a conflict for a person subject to this Code also will be a conflict if it is related to a member of his or her family or a close relative. Examples of conflict of interest situations include, but are not limited to, the following (i) any significant ownership interest in any supplier or customer (i.e., 5% or greater), unless such relationship is disclosed to and approved by the Chief Executive Officer of the Company; (ii) any consulting or employment relationship with any customer, supplier, or competitor; (iii) any outside business activity that detracts from an individual's ability to devote appropriate time and attention to his or her responsibilities with the Company; (iv) the receipt of any money, non-nominal gifts, or excessive entertainment from any company with which the Company has current or prospective business dealings; (v) selling anything to the Company or buying anything from the Company that is material under the applicable disclosure thresholds, except on the same terms and conditions as comparable officers or directors are permitted to so purchase or sell; and (vi) any other circumstance, event, relationship, or situation in which the personal interest of a person subject to this Code interferes – or even appears to interfere – with the interests of the Company as a whole.

Reimbursement for Political Contribution

Federal law prohibits companies from making contributions or gifts of any kind to any political candidate or campaign committee in connection with any federal election. Such prohibited political campaign contributions include money (i.e., cash or checks) or any in-kind contribution of property, goods, or services. Federal rules also prohibit any person from making a personal contribution and then receiving reimbursement from corporate funds through an expense account, a bonus, or other form of direct or indirect compensation. Certain state laws also prohibit companies from making contributions or gifts of any kind to any political candidate, campaign committee, or other organization in connection with any state or local election and similarly prohibit the use of corporate funds to reimburse any person from making a political contribution. It is the Company's policy to comply with these and all other laws regarding political contributions. Employees, officers, and directors must never use any Company facility or other resources in connection with campaign activity without prior confirmation of its legality

from the General Counsel. Employees, officers, and directors must also never request or approve a request for reimbursement in violation of this Code. Employees, officers, and directors are, of course, free to participate or contribute to any political campaign as an individual, subject to any individual limitations.

II. COMPLIANCE WITH LAWS:

It is the Company's policy to obey applicable federal, state, and local laws, rules, and regulations in every jurisdiction in which it operates. No employee may take any action on behalf of the Company that he or she knows or should know violates any applicable law, rule, or regulation. Employees are encouraged to contact the General Counsel if uncertain about whether or not any transaction or other activity would violate this Code or any applicable laws, rules, or regulations.

Equal Opportunity Employment; Discrimination and Harassment Policy

The Company requires complete compliance with all applicable equal employment, discrimination, and harassment laws and regulations. It is our policy to recruit, select, train, and pay our employees based on merit, experience, and other work-related criteria. Offensive or hostile working conditions created by discrimination or harassment will not be tolerated. Accordingly, all officers, directors, and employees of the Company are prohibited from:

- Using any differences protected by law (such as race, color, age, sex, national origin, disability, religion, veteran status, sexual orientation, or any other status protected by federal, state, or local law) as a factor in hiring, firing, or promotion decisions or when determining terms or conditions of employment, such as work assignments, employee development opportunities, vacation, or overtime;
- Engaging in any abusive, deceitful, or violent behavior;
- Engaging in any verbal or physical harassment regarding the racial, ethnicity, religious, physical or sexual characteristics, or sexual orientation of another; and/or
- Retaliating against any employee who makes a complaint in good faith or participates in an investigation related to a violation or potential violation of the Code or the Company's policy on equal employment, discrimination, and harassment.

Fair Competition and Antitrust Policy

The Company must comply with all applicable fair competition and antitrust laws. These laws attempt to ensure that businesses compete fairly and honestly and prohibit conduct seeking to reduce or restrain competition. At a minimum, no employee, officer, or director should: (i) make any agreement with a competitor regarding pricing, pricing practices, bids, bidding practices, terms of sale, or marketing practices; (ii) agree with a competitor to coordinate bids; (iii) divide customers, markets, or territories with a competitor; (iv) agree with a competitor not to do a deal with another company; or (v) engage in any other unfair methods of competition or deceptive acts or practices.

Gifts, Bribes, and Kickbacks

Officers, directors, and employees are prohibited from accepting, soliciting, offering, or agreeing to pay bribes, kickbacks, gifts of other than nominal value, loans, personal services, or other monetary benefits from a current or prospective supplier, customer, subcontractor, competitor, or other individual or organization with which the Company does business, other than modest gifts or business amenities, such as meals, reasonable entertainment,

or Company-branded marketing items. Cash or cash equivalent tips or gifts may never be given or accepted. Employees, officers, and directors must not provide gifts or entertainment if such action would violate a customer's code of ethics, business conduct, or any other policy or contract between the customer and the Company. In no event may an employee, officer, or director accept any gift in exchange for taking or failing to take any action on behalf of the Company or that would cause third parties to believe that a gift was accepted in exchange for taking or failing to take any action on behalf of the Company. Employees are encouraged to contact the General Counsel if uncertain about whether or not a potential gift is acceptable and in compliance with this Code.

International Business Transactions

It is the Company's policy to abide by the national and local laws of the countries where we operate, including immigration, customs, tax, or exchange control laws or regulations, except to the extent such is disallowed or penalized by U.S. law. Actions taken with the intent to circumvent the application of such laws are prohibited. The observance of applicable laws, including the laws of the U.S. that have application outside of any United States territory, is a strict requirement for all employees in the conduct of the Company's affairs.

A. Foreign Corrupt Practices Act

To comply with the U.S. Foreign Corrupt Practices Act (the "FCPA"), the Company has adopted a Foreign Corrupt Practices Act Policy (the "FCPA Policy") for the Company's affiliates, subsidiaries, directors, officers, employees, representatives, shareholders, consultants, and anyone who acts on behalf of the Company in any international business activities. The purpose of the FCPA Policy is to ensure compliance with both the FCPA and the related laws of the countries in which the Company and its affiliates may do business now or in the future. The FCPA Policy prohibits the payment of money or anything of value directly or indirectly to officials of a foreign government, public international organization, or a foreign political party by companies to obtain business, retain business, or to secure any influence or improper advantage. The FCPA Policy also provides guidance on how the Company maintains its books, records, accounts, and internal accounting control systems. A copy of the FCPA Policy is available to employees upon request from the Company's Legal Department or Human Resources Director. All employees are required to become familiar with the Company's FCPA Policy before conducting business, or taking any steps to conduct business, with or in any country outside of the United States.

B. Export Controls

All employees are required to consult with the General Counsel prior to completing or entering into any transaction to export goods or services outside of the United States. Employees involved in any export transaction must observe the following requirements:

- All information furnished in connection with the export must be accurate and truthful, including information relative to the value of the exports and the technology in question. This requirement applies whether the information is furnished to the government, co-workers or third parties that are engaged to facilitate the export on behalf of the Company.
- Employees must take steps to ensure regulations or specific export licenses used in transactions cover the exports included in such transaction, including exports of goods, services or technology.
- Alert to instances in which inaccurate information may have been furnished to us or to our agents relative to the ultimate destination or use of the export.

C. Anti-Boycott Controls

The Company requires its employees to comply with all U.S. anti-boycott laws. U.S. anti-boycott laws and regulations prohibit or severely restrict the Company, its subsidiaries, and certain affiliates from participating in boycotts against countries friendly to the United States. Additionally, U.S. law prohibits compliance with requests for information or other actions that further boycotts and requires the Company to report, in certain instances, both legal and illegal boycott requests to the U.S. government. Violations can result in criminal penalties, loss of tax benefits, and loss of export privileges. Company employees are required to consult with the General Counsel before becoming involved in any boycotts against countries of any kind.

D. U.S. Sanctions Policy

From time to time, the United States prohibits or restricts trade and other commercial dealings between U.S. persons (which term includes U.S. citizens, U.S. incorporated companies, aliens resident in the U.S., and in some instances foreign-based affiliates of U.S. companies) and certain countries, including residents and citizens of those countries. Violations of the restrictions and prohibitions can result in the imposition of substantial fines or imprisonment for prosecuted violators. The Company requires that all employees adhere to these restrictions and prohibitions. The countries and citizens or residents of those countries that are the target of these prohibitions change from time to time. Further, the regulatory controls on those countries vary both in scope and complexity.

III. ENVIRONMENTAL, HEALTH, AND SAFETY:

Compliance with EHS Policies

All Company employees are required to abide by all Company environmental, health, and safety policies and procedures, including:

- Complying with all applicable environmental, health, and safety laws, regulations, permits, and other requirements;
- Following work instructions or procedures relating to environmental, health, and safety, legal compliance laws, regulations, and risk management;
- Promptly reporting all environmental, health, and safety incidents in accordance with Company environmental, health, and safety policies; and
- Reporting to work fit to perform his or her duties free of the effects of alcohol or drugs.

Substance Abuse

The possession, use, purchase, sale, or transfer of any illegal drugs or controlled substances (except drugs medically prescribed for the employee) by any employee while on Company premises, engaged in Company business, or while operating Company vehicles or equipment, is prohibited. Similarly, unauthorized use of alcohol in a Company facility or on Company premises is prohibited. Illegal drugs and controlled substances are defined as all forms of depressants, hallucinogens, narcotics, stimulants, and other drugs whose possession, transfer, or use is restricted or prohibited by law.

Any employee who is taking a drug or medication that affects the employee's ability to perform work in a safe and effective manner should report the use of such medication to the employee's supervisor per the Company's environmental, health and safety policies. This includes prescribed drugs and drugs or medications that are known

or publicized as affecting judgment, coordination, or other senses.

IV. CONFIDENTIAL INFORMATION:

Safeguarding the Company's Confidential Information is critical to its continued success. For this reason, each employee is required to sign an Employee Non-Disclosure Agreement upon joining the Company, which defines each employee's duty to protect the Company's Confidential Information. These obligations apply throughout each employee's employment and continue even after employment ends.

Employees are required to hold the Company's Confidential Information (including trade secrets) in strict confidence and must not, either directly or indirectly, use, distribute, give, show, disclose, disseminate, copy, or otherwise communicate any Confidential Information without verifying with their supervisor that such disclosure is appropriate and authorized. Confidential Information includes, but is not limited to, the following:

- Information regarding customers, contractors, and the industry not generally known to the public;
- Strategies, methods, books, records, and documents;
- Technical information concerning products, equipment, services, and processes, and other information protectable as a trade secret under applicable law;
- Procurement procedures, pricing, and pricing techniques;
- Information concerning past, current, and prospective customers, investors, and business affiliates (such as contact name, service provided, pricing, type, and amount of services used, financial data, and/or other such information);
- Pricing strategies and price curves, and positions;
- Plans or strategies for expansion or acquisitions;
- Budgets, market research, or financial and sales data;
- Evaluations, opinions, and interpretations of information and data;
- Marketing and merchandising techniques;
- Electronic databases, models, specifications, computer programs, technologies and methods;
- Contracts, bids, or proposals;
- Training methods and processes, organizational structure, personnel information, payments or rates paid to consultants or other service providers, and other such confidential or proprietary information.

Even within the Company, Confidential Information should be shared only on a need-to-know basis. Employees with any questions related to the protection of Confidential Information should contact the Company's Legal Department for guidance before disclosure.

V. ADMINISTRATION OF POLICY:

Procedure for Confidential Submission of Information, Questions, or Concerns

If an employee knows or suspects a violation of any law, rule, or regulation, the Code, or the Company's related policies and procedures, the employee must report that information immediately to the Company. This can be done by contacting the employee's supervisor, the Company's Legal Department, the Company's Human Resources Director, or the Strike Helpline. If an employee receives notice (oral or written) of a violation of any law, rule, or regulation from a government agency, this information must also be reported immediately. Supervisors are responsible for addressing employee complaints and reporting violations to the Company's Legal Department as soon as possible.

If an employee is involved in a violation, the fact that he or she reported the violation, together with the degree of cooperation displayed and whether the violation is intentional or unintentional, will be given consideration by the Company in its investigation and any resulting disciplinary action.

To report a concern utilizing Strike's confidential and anonymous helpline, go online at www.strike.ethicspoint.com or call 1-844-222-6115.

No Retaliation

Retaliation against any person who in good faith makes a submission about any violation of any law, rule, or regulation, the Code, or the Company's related policies and procedures will not be tolerated and will be a cause for discipline, including possible loss of employment. A person may report retaliation by the same procedure described above for reporting information, questions, complaints, or concerns.

Review and Investigation

All reported violations of any law, rule, or regulation, this Code, or the Company's policies and procedures will be treated confidentially to the extent practicable under the circumstances and in accordance with the Company's legal obligations. All investigations will be under the direction of the Company's General Counsel along with the Legal Department and Human Resources Director, as appropriate. Employees are expected to cooperate fully in the investigation of any alleged violation of applicable laws, rules, or regulations, this Code, or the Company's policies and procedures.

If the result of the investigation indicates that corrective action is required, the Company will promptly determine what steps it should take to rectify the problem and prevent its recurrence. The Company's General Counsel will review all reports of suspected violations of this Code. It is imperative that reporting persons do not conduct their own investigations because investigations may involve complex legal issues and interference may compromise the integrity of an investigation and adversely affect the reporting person and the Company.

VI. ADDITIONAL RESOURCES:

POLICIES AND REFERENCES

- Foreign Corrupt Practices Act Policy
- Economic Sanctions Compliance Policy
- Corporate Health and Safety Procedures Manual
- Drug and Alcohol Policy
- Anti-Drug and Alcohol Misuse Prevention Plan (PHMSA)
- Alcohol, Drug and Contraband Policy (Non-DOT Policy)
- Unlawful Harassment Policy

Code of Ethics & Business Conduct

EMPLOYEE CERTIFICATION & COMPLIANCE STATEMENT

I have read and understand the Code. I agree to comply with it and help ensure compliance with these standards. I understand that violation of the Code may result in disciplinary action up to and including termination of employment, and potential prosecution by law enforcement and imposed monetary fines and penalties.