

# CODE OF BUSINESS CONDUCT



ACTING WITH INTEGRITY  
AROUND THE GLOBE

2023

# A MESSAGE FROM STEVAN SLIJEPCEVIC PRESIDENT & CEO

Dear CUBES:

Cubic is built on a legacy of leadership in creating and delivering innovative solutions that make the world better – and the way we all perform our work through our values, ethics and team-based approach is critical. Our Code of Conduct sets the expectations and provides guidance on how to make these ethical choices. It is important that each of us reads and understands the Code so we may conduct our business in accordance with it and continue to serve our customers, each other, and our communities with integrity.

To our CUBES, all over the world, thank you for all you have done to not only make Cubic an industry leader on which our customers can rely, but also a great place to work.

The future of Cubic is bright and robust with great opportunities thanks to each and every one of you. As we continue to work together adhering to our Code, we are able to achieve the best outcomes for each other and our company.

Thank you again for being a part of it.

## ABOUT OUR CODE OF CONDUCT

The Code of Conduct reflects the business conduct standards expected of all our employees. It provides a general framework for situations that may arise in your day-to-day activities on behalf of the company. It also tells you where you can get more detailed information and who you can ask for help.

All of us, wherever we work, must follow the highest ethical standards when dealing with fellow employees, customers, suppliers, contractors, stakeholders and competitors. We take failures to comply with the Code very seriously and violations may result in disciplinary action, including and up to, employment termination.

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# CUBIC'S CULTURE

## WE RESPECT OUR CODE

Being a responsible and ethical company is fundamental to achieving our mission. What we do, and how we do it, makes a difference – every day. As a company and as individuals we must be committed to impeccable ethics in all aspects of our business. With this commitment comes the personal responsibility of every Cubic employee to practice and uphold the standards set out in this Code, Cubic policies and applicable law.



## WE USE GOOD JUDGMENT

Some situations involve difficult choices, and arriving at the right answer is not always easy or obvious. If you are unsure of the right course of action, you must speak up and ask questions. When you raise your concerns openly, we can help you do the right thing.

When in doubt about a course of conduct, ask yourself these questions:

- Is it legal?
- Is it consistent with our Code and the spirit of the law?
- Is it ethical and the right thing to do?
- Consider how it will impact those around you: coworkers, customers, stakeholders, etc.
- Consider how you would feel if it were reported to your senior management or in the newspaper.
- If you are unsure, have you sought advice from others?

If the answer is “no” to any of these questions, stop and seek guidance from a knowledgeable source before you act.

## WE LEAD BY EXAMPLE

Each of us sets an example every day. You have an obligation to be accountable for your actions, value the perspectives of others and be professional in conducting our business by striving for excellence in how and what you deliver. Our collective behavior is the foundation of our business integrity.

Cubic managers have unique leadership responsibilities. We expect them to:

- Consistently exhibit our values and standards of conduct.
- Foster their employees' understanding of the Code, as well as other applicable policies and laws.
- Actively promote ethical conduct and the importance of compliance.
- Intervene to stop violations of the Code and prevent any reoccurrence.
- Cultivate an environment where employees feel comfortable reporting concerns.
- Take prompt and appropriate action in response to reported concerns.

As a manager, if you receive a report about a possible violation of our Code, other Cubic policies or the law, please seek help as necessary so we can take steps to promptly investigate the matter, address any violations, and work to prevent future occurrences.





## WE DO OUR PART

If you are asked to do something that makes you feel uncomfortable, or you see or suspect something that is not right, you have an obligation to speak up and let someone know. Cubic's reputation is earned and to protect that reputation we must act decisively to do what's right.

You have multiple ways to raise a concern so please choose the one that is right for you. Options include:

- Speak with your supervisor or another manager
- Contact your HR business partner
- Reach out to Corporate Ethics & Compliance at [corporatecompliance@cubic.com](mailto:corporatecompliance@cubic.com)
- Contact the Legal Department at [corplegaldept@cubic.com](mailto:corplegaldept@cubic.com)
- Utilize the Cubic Helpline (see following page for full details)

More Guidance on Cubic's Culture:

- Contact your HR Business Partner
- Contact a member of the Legal or Ethics & Compliance team at [corporatecompliance@cubic.com](mailto:corporatecompliance@cubic.com)

# RAISING CONCERNS

If you believe that our legal or ethical responsibilities are being violated, or you are being pressured to violate the law or our ethical responsibilities, you have an obligation to communicate your concern to the company.

You may report the matter to your manager, senior management, your HR business partner, ethics and compliance, or Cubic's Helpline. You should use the method of communication that is most comfortable for you.

Cubic's Helpline provides employees with a confidential and secure way to obtain advice or raise concerns. Employees and contractors with whom we work may access our helpline through free of charge telephone numbers or a secure web portal.

You may remain anonymous, although we encourage you to provide your name so we can ask follow-up questions. If you make an anonymous report, please provide as much detail as possible.

**CUBIC WILL NOT TOLERATE RETALIATION FOR MAKING REPORTS IN GOOD FAITH.  
SO IF YOU SEE MISCONDUCT, DO THE RIGHT THING AND SPEAK UP.**

**CUBIC HELPLINE: (800) 461-9330**  
**REPORT ONLINE: [cubichelpline.com](http://cubichelpline.com)**

The Cubic Helpline is available 24/7 in multiple languages. Both helpline calls and website reports are answered by an independent third party that is required by contract and applicable laws to provide confidentiality. The helpline does not use online monitoring caller ID, recorders, or other devices that would identify or trace the caller's number.

When you utilize the Cubic Helpline, what can you expect?

- You will be asked to provide relevant details, which will be included in a report prepared by our independent helpline provider. The report will be forwarded to corporate compliance.
- The concern will be reviewed by ethics and compliance and a representative from the appropriate department(s) such as human resources, legal, security, IT, etc.
- The matter will then be reviewed by a member of the appropriate department or, if necessary, assigned to a third-party investigator.
- The concern will be handled promptly, discreetly and professionally. Discussions and inquiries will be kept in confidence to the greatest extent practicable.
- Within the bounds of applicable privacy and personnel laws, we will share with you our investigation conclusions and actions taken.

## PREFER TO SEND A TEXT?

Your cell phone number  
will not be disclosed.

**SMS (619) 612-5459**

Available in Canada, Mexico  
and the United States.

Texting charges may apply.

Our helpline is maintained by  
an independent third party  
and is available 24/7

**PLEASE NOTE THE CUBIC HELPLINE IS NOT AN EMERGENCY SERVICE.  
CONTACT YOUR LOCAL AUTHORITIES IF THIS IS A LIFE THREATENING ISSUE.**

# RESPECT AT WORK

## WE EMBRACE DIVERSITY AND INCLUSION

We recognize that diverse, inclusive and highly engaged teams make our purpose come alive. Cubic is committed to a globally inclusive workplace where people of all backgrounds and abilities can contribute knowing that they are respected, empowered and supported. When we embrace different points of view, cultures and expertise we are better positioned to attract, develop and retain top talent. A diverse workforce better positions us to develop the innovative products, services and solutions our customers expect and for us to be competitive in a global marketplace.

Additionally, to foster a diverse and inclusive workplace, we are committed to fair employment practices. Our employment decisions are based on merit, including factors such as performance, experience, skills and versatility. We do not make employment decisions based on legally protected characteristics such as race, color, age, gender, national origin, ancestry, religion, physical or mental disability, sexual orientation, gender identity, military or veteran status, or citizenship status (except as required within our defense business). This standard applies to all terms and conditions of employment, including recruiting, hiring, transfers, promotions, terminations, compensation and benefits.



We each have a responsibility to contribute to a diverse and inclusive work environment. This means we must treat others with dignity and respect – and recognize that we all benefit from the views and opinions of colleagues, even when we disagree. It also means embracing different points of view, cultures and expertise to build a global network based on mutual respect and trust.

We must confront decisions and behaviors that are based on conscious or unconscious biases and remove barriers to inclusion. We need to commit to being allies, be a role model for inclusive and culturally competent behavior, and stand up for each other and speak up, even when it's inconvenient or uncomfortable.

Maintaining a positive and productive workplace also means we will not tolerate abusive, offensive, threatening, or other disturbing behavior toward or among employees. We also strictly prohibit all forms of harassment that violate our policies or applicable law.



## WE COMMUNICATE WITH CARE

In today's interconnected world, how we communicate and conduct ourselves in person and online is more important than ever. Online communication is ever-present in our personal lives and a powerful business and marketing tool for Cubic. Being able to share ideas and information in real time enriches our lives and propels our business. Sometimes, however, the line between our personal and professional lives can blur and problems can occur if we don't choose our platforms or words carefully when discussing work, colleagues or the company.

Cubic embraces the use of online platforms to engage in meaningful and thoughtful ways about our company and with our colleagues – just be smart. When using social media to share information or opinions about your work, colleagues or the company, be mindful to:

- Communicate in a way that is respectful and professional
- Avoid using the names of colleagues, customers, vendors or business partners without their consent
- Never disclose company confidential or proprietary information
- Avoid gossip – it can be hurtful to others and discourages teamwork
- Keep personal and professional posts separate; individual opinions are fine to express but they don't represent Cubic as a whole.

It's important we consider our conduct online as much as we do in person. Whether it's protecting the confidentiality of the information with which we are entrusted or ensuring personal statements posted online don't give the appearance of representing Cubic, we must all remember our actions online can have far reaching real world implications. Only those authorized to speak on behalf of Cubic may do so.

## WE DO NOT RETALIATE

Cubic wants and needs employees and others who work with us to report possible legal and ethical violations. We do not permit or tolerate retaliation against anyone for raising a good-faith concern or participating in an investigation. Retaliation can take many forms – overt and subtle – including adverse employment actions, threats, harassment, ostracism, deprivation of career opportunities and similar conduct.

### **More Guidance on Respect at Work:**

- Equal Employment Opportunity & Anti-Harassment
- Human Rights
- Reasonable Accommodation
- Media Relations
- Social Media

# CONDUCT BUSINESS WITH INTEGRITY

## WE UPHOLD THE HIGHEST STANDARDS

Our contractual dealings with customers, subcontractors and suppliers will be fair, honest and meet best business practices.

When we are bidding on or negotiating a contract, we will follow our procurement policies and procedures and all applicable laws and regulations. Those laws and regulations may include, without limitation, the Federal Acquisition Regulation (FAR); Defense FAR Supplement (DFARS); export regulations such as the U.S. International Traffic in Arms Regulation (ITAR) and the U.S. Export Administration Regulation (EAR); U.S. Bureau of Alcohol, Tobacco and Firearms (ATF) regulations; U.S. antiboycott regulations; international currency exchange regulations; the U.S. Foreign Corrupt Practices Act (FCPA); the UK Bribery Act; and trade laws such as the Buy American Act, Trade Agreements Act, and North American Free Trade Agreements Act (NAFTA).

Cubic's Integrated Supply Chain (ISC) and Contracts departments, as well as other Cubic employees involved with the procurement process, are responsible to be informed of applicable regulations and company policies, abide by them, and assist other personnel as necessary to maintain compliance.

Every employee involved in procurement, contracting or purchasing is responsible for ensuring that all statements, communications and representations are accurate and truthful.

We will not solicit, accept or use any information from a competitor's bid, proposal or contract that we know to be proprietary or legally restricted from disclosure. If you ever have a question as to whether the release or receipt of such information is authorized or legal, do not copy, distribute or use the information until you have received guidance from Cubic's legal counsel.

When purchasing goods or services for Cubic's use or for incorporation into products or other solutions that we provide to our customers, we will utilize competition among suppliers to the maximum extent possible, thereby allowing multiple suppliers with an opportunity to compete. This will ensure lower prices, less risk and greatest overall value for Cubic.

Only personnel with delegated authority to process and administer procurement transactions may enter into contractual commitments with customers or suppliers on Cubic's behalf.

We will uphold our values when pursuing new business and not pursue business opportunities with customers whose values fundamentally conflict with our own.



## WE AVOID CONFLICTS OF INTEREST

A conflict of interest (CoI) exists in any situation where competing interests may affect your job performance or impair your ability to make objective and unbiased decisions. Examples of potential conflicts include managing a family member or close friend, holding a second job with competing interests or a significant demand on your time, having a material financial interest in suppliers or competitors, engaging in an intimate relationship with a subordinate employee, or discussing potential employment opportunities at Cubic with a government employee working on one of our contracts.

You must promptly disclose any situation, transaction or relationship that creates or could potentially give rise to a conflict of interest by contacting your HR business partner or Corporate Compliance to submit a CoI disclosure form for legal review and approval.

## WE COMPLY WITH GIFTS AND ENTERTAINMENT RULES

Cubic competes on the merits of its products and services and does not use the exchange of business courtesies to gain an unfair competitive advantage. Giving and receiving business courtesy is only permitted when doing so is legal, in compliance with all applicable Cubic and customer policies, and does not create the impression that it is given to influence business judgment.

Business courtesies may be tangible or intangible items and include gifts, meals, drinks, entertainment, recreation, prizes, transportation, discounts, promotional items, or the use of a donor's time, materials, facilities or equipment. Any gift that could be deemed as unreasonable must be avoided and all gifts exceeding \$500 in value are never appropriate without prior written approval from Cubic's legal department.

Any employee who offers, or approves the offer of, a business courtesy must ensure that it is proper and cannot be interpreted as an attempt to gain an unfair business advantage or otherwise adversely impact the reputation of, or embarrass, Cubic or the recipient. Personal funds or resources may not be used to avoid any restrictions on the giving of business courtesy. Solicitation of business courtesies is always prohibited.

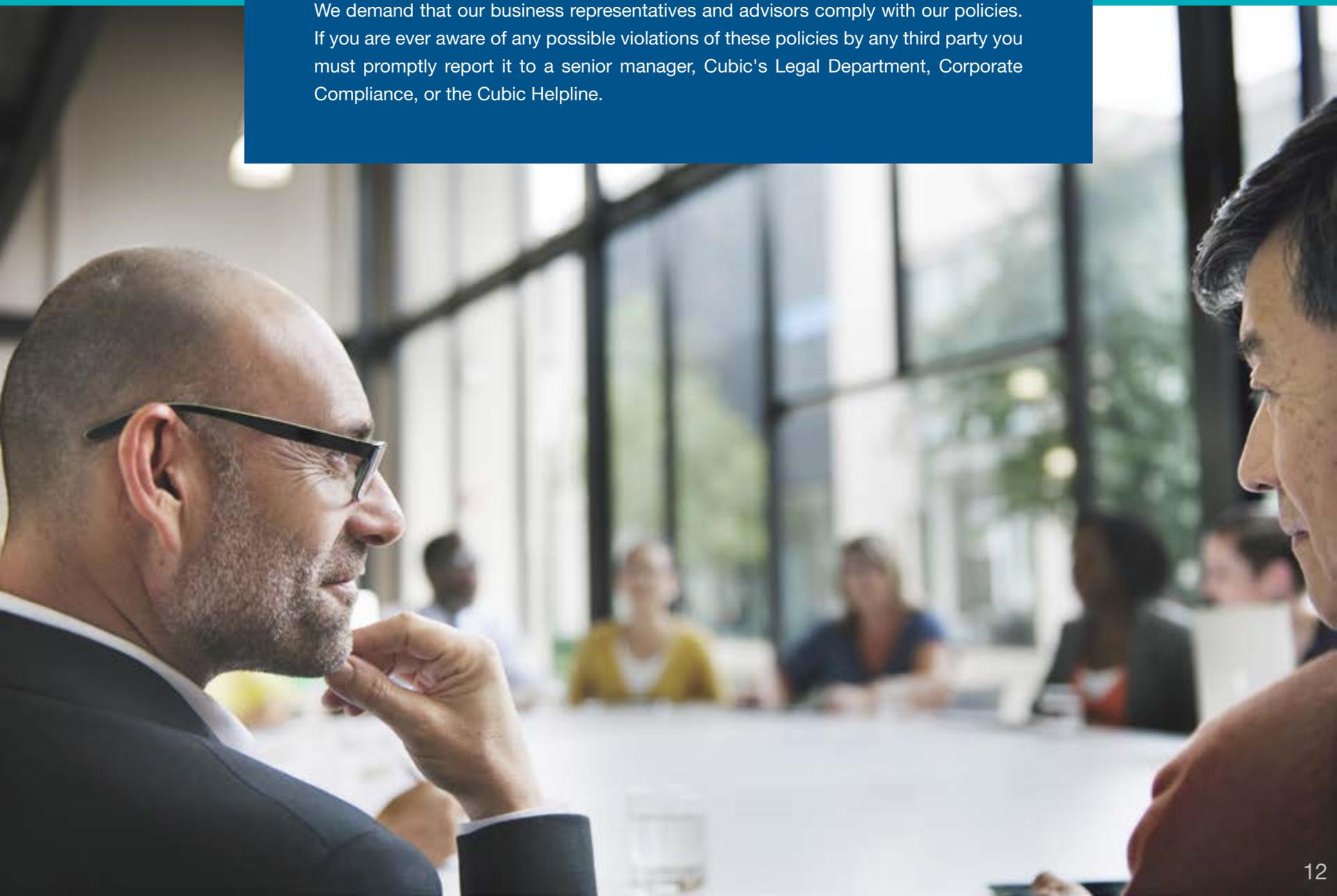
Government employees in the U.S. and other countries are subject to varied and complex rules that often prohibit them from accepting any items of value except as specifically provided under relevant regulations. Strict rules also apply to the giving of business courtesy to any elected official. You should consult with executive leadership within your business unit or Cubic's Legal Department before giving any gift or business courtesy to a government employee or elected official of any nation. Some business units may have very specific rules or prohibitions about gifts or business courtesies to government personnel.

## WE CHOOSE OUR THIRD PARTIES CAREFULLY

The actions of our consultants, brokers, technical advisors, sales representatives and other third parties reflect upon and impact Cubic. We will only work with consultants and business representatives of known integrity and require that their conduct meet our standards.

Employees involved in engaging or overseeing third parties must comply with all Cubic policies and procedures regarding third-party selection, approval, due diligence and appropriate monitoring. Third parties must never be engaged for improper or illegal purposes such as paying bribes or kickbacks, engaging in industrial espionage, or obtaining the proprietary information of others.

We demand that our business representatives and advisors comply with our policies. If you are ever aware of any possible violations of these policies by any third party you must promptly report it to a senior manager, Cubic's Legal Department, Corporate Compliance, or the Cubic Helpline.



## WE DO NOT TOLERATE CORRUPTION AND BRIBERY

Our reputation for honesty is far more important than any new business opportunity. We will not engage in bribery or any other type of corruption, whether involving public officials or private individuals – even if that means not winning new business.

All countries in which we have operations and/or are pursuing new business, including the United States, United Kingdom and Australia, have passed laws criminalizing bribery of government officials. These laws apply to all Cubic employees around the world.

The sanctions for violating these laws can be severe. For Cubic, they can include significant corporate fines, suspension, debarment, adverse publicity and a destroyed corporate reputation.

For Cubic employees who engage in bribery or other such illegal conduct, those sanctions can include individual fines, loss of employment and imprisonment.

We must never offer, attempt to offer, authorize or promise any sort of bribe, payment or kickback to a government official or private party for the purpose of obtaining or retaining business or an improper advantage. Likewise, we must never solicit or accept a bribe or kickback from a public official or private party. A bribe includes any payment, benefit or gift offered, promised or given with the purpose of influencing a decision or outcome.

Cubic also prohibits “facilitation payments,” which are small sums paid to foreign government officials to expedite or facilitate nondiscretionary actions or services, such as obtaining an ordinary license or government service. We must never hire someone else (e.g., a sales representative, consultant, or reseller) to do anything that we cannot ethically or legally do ourselves. Cubic and its employees can be held liable for bribes paid by a third-party agent or consultant acting on Cubic’s behalf.

We will use reasonable diligence in vetting the legitimacy of business dealings with customers and partners. We will not be party to any likely or known illegal or fraudulent transactions or business dealings.

All employees who interact with current or potential customers have an obligation to understand and comply with all company policies and applicable laws pertaining to anti-bribery and anti-corruption. Cubic provides training and resources on these standards; however, when in doubt, consult your management team or Cubic’s Legal Department.

## WE UPHOLD EXPORT/IMPORT LAWS

Cubic provides high-tech products and services to customers globally. Many of these items are subject to export and import control laws governing strategically important technologies and products. Violation of such controls can harm national security and foreign policy. Therefore, it is critical that we comply with all applicable regulations that govern our export and import activities.

Export and import controls govern the transfer of certain controlled tangible products, technical data, software source-code, as well as the provision of services (“controlled items”). Export restrictions may apply whenever controlled items are provided to, or accessible by, a foreign entity or person. This includes access to or disclosure to foreign persons in the United States. Controlled items may be provided physically or materially; orally in conversation or by telephone; electronically by e-mail or fax; or by other means. Every export of a controlled item requires some form of government authorization; such authorizations include exemptions, licenses or agreements.

If you are involved in any way with business outside the country or company in which you work, you must be familiar with Cubic’s policies and procedures for handling products and technology or providing services that may come into or go outside of your country. You must also carefully follow all applicable export/import regulations. Failure to do so could expose the company and yourself to potential fines, criminal prosecution and loss of export privileges.

Involvement in business outside your country can mean many things. Examples include submitting a proposal to a foreign government customer; codeveloping with Cubic engineers from different subsidiaries; forwarding a technical drawing to a potential supplier in another country; or having contact with a foreign or dual national inside a company facility or at a trade show.

We do not expect every employee to be an expert in the complex area of export and import regulations. However, you must be accountable for knowing the rules that apply to the work you do. If you are even in doubt about such requirements you must seek advice from a member of the Global Trade Compliance team or you may send an email to [global.trade.compliance@cubic.com](mailto:global.trade.compliance@cubic.com)



## WE COMPETE FAIRLY

Our long-term success depends on upholding the integrity of our business development activities. Every employee directly or indirectly involved in the business development process has a responsibility to behave fairly and ethically when competing for business. Competition and antitrust laws prohibit anti-competitive behavior such as conspiring with others to fix prices or agreeing with competitors not to compete in certain regions or on particular contract opportunities.

### **We will comply with fair competition standards when we discuss business opportunities with other companies by:**

- Not discussing pricing with competitors.
- Not discussing or agreeing to share a market or conspiring to split specific bids.
- Reporting inappropriate inquiries or conversations to Cubic's Legal department.
- Complying with all applicable fair competition laws.

## WE CHARGE OUR TIME ACCURATELY

Employees who charge their work time to commercial projects or in support of a government contract, i.e. “direct charge” employees, are personally responsible for ensuring that their hours worked are accurate and charged to the correct project number(s). This means maintaining an accurate, daily record of time spent by project; working in accordance with applicable work plans; and certifying the accuracy of your timesheet on a weekly or biweekly basis, as directed. Never charge time to a customer contract or project that was not actually worked; this is dishonest and can be illegal. Time charging violations damage customer trust and can subject Cubic and its employees to substantial fines and penalties.

Managers have special obligations when it comes to time charging. They must provide employees with accurate work plans, as applicable and in accordance with policy; review and approve their employees’ recorded work time and project numbers; and investigate any questionable time charges. Managers must never direct or permit employees to inaccurately record hours worked or record hours against the wrong project number(s).

## WE KEEP ACCURATE RECORDS

We must record all costs, expenditures and other business transactions accurately and in accordance with our expense, accounting and record keeping policies and approved procedures.

Accurate, honest and objective recording of all expenditures and other business transactions is essential to maintain the integrity of our customer billing and cost estimating processes. Failure to record and report assets, materials and charges accurately will damage the company’s credibility and reputation and potentially expose it to legal liability.

### **More Guidance on Conduct Business with Integrity:**

- Anti-Bribery and Anti-Corruption
- Contract and Proposal Review and Approval
- Conflicts of Interest
- Gifts and Hospitality
- Third Party Due Diligence
- Time Recording

# PROTECT OUR PEOPLE AND OUR ASSETS

## WE PUT HEALTH AND SAFETY FIRST

Cubic is committed to providing a healthy and safe workplace; likewise, all employees have a responsibility to work safely and encourage others to do the same. While complying with safety rules and procedures is an essential minimum, we also aim to prevent injuries and property damage by understanding the risks present in our work environment and understanding how accidents can occur. We should all seek to identify areas to improve safety measures to protect employees, customers and others at our work sites.

We must:

- Be familiar with and follow all company health and safety policies and procedures, as well as applicable safety laws.
- Observe all company and customer work site access procedures.
- Never work under the influence of alcohol, illegal drugs or prescription drugs that impair our ability to work safely.
- Intervene immediately if someone is putting themselves or others at risk and report observed risks to management.
- Promptly report all accidents and injuries to management or a Health and Safety representative.
- Always look out for the safety of your fellow employees, employees you manage and others.

## WE STRIVE TO PREVENT WORKPLACE VIOLENCE

Acts of violence, threats and intimidating behavior are serious violations of our Code and our principles and will not be tolerated. Cubic strictly prohibits weapons in the workplace except as may be expressly authorized under our policy, or as required for the performance of work. Each employee has an obligation to immediately report any act, behavior or threat of violence to security, management and/or local law enforcement.





## WE SAFEGUARD BUSINESS INFORMATION

As a company that creates and delivers innovative and specialized technology solutions and services, Cubic's proprietary information and trade secrets are among our most valuable assets and must be safeguarded. This includes confidential information related to our inventions, innovative customer solutions, financial information, technical business data, our technology and business plans, and other trade secrets. We have an obligation to protect the confidentiality of this information, as well as classified government information, and other sensitive information entrusted to us by our customers and business partners.

We must all adhere to applicable confidentiality and security policies, as well as legal obligations, regarding the use and disclosure of this information. This could mean:

- Only disclosing company confidential information outside the company on a need-to-know basis as part of a formally established confidential relationship or nondisclosure agreement.
- Following all applicable export restrictions on technical data.
- Maintaining the secrecy of proprietary information from a previous employer.
- Respecting the copyrighted or trademarked work of others.
- Remaining obligated not to disclose the company's confidential information for employees who leave the company and who may also be required to execute additional agreements to that effect.

## WE PROTECT EMPLOYEE AND CUSTOMER INFORMATION

Our employees, customers, patrons of our customers and business partners entrust us with personal information like addresses, government I.D. numbers, birth dates and bank account numbers. To maintain their trust and comply with our legal and contractual obligations we must all rigorously protect the secrecy of personal information. This includes:

- Ensuring that all personal data is collected, stored, used and disclosed only in accordance with Cubic policies and applicable laws.
- Restricting access to this data to only those authorized individuals with a "need to know."
- Ensuring we have a lawful basis to do so prior to any cross-border transfers and that the destination country has been deemed to have adequate safeguards offering the same or higher data security than country of data transfer origin or some other lawful mechanism exists.

Anyone who is aware of or suspects that personal information was accessed by an unauthorized person, disclosed inappropriately, used for nonbusiness purposes or gathered inappropriately, must immediately bring it to the attention of the data privacy counsel or a data privacy officer directly or contact Data Privacy at [dataprivacy@cubic.com](mailto:dataprivacy@cubic.com).

## WE HANDLE CLASSIFIED INFORMATION CORRECTLY

Improper or unauthorized handling of government classified or protectively marked information may damage the national security of the countries with which we do business. It may also damage our business and reputation with our valued customers, and lead to sanctions and fines.

This means we have a responsibility to handle all government classified or protectively marked information in accordance with all applicable Cubic and government regulations, policies and processes. We must also refrain from discussing or working with such information in public areas where the conversation may be overheard or information compromised. Do not discuss classified information with anyone unless you have confirmed that they have the appropriate security clearance and an actual need to know.

Employees who hold any form of security clearance must be familiar with and abide by their applicable security manual and regulations, including the requirement to report any adverse information relevant to their fitness to hold such a clearance to their facility security officer (FSO), director of security or equivalent personnel outside the U.S.

### **More Guidance on Protect Our People and Our Assets:**

- Health & Safety
- Data Categorization and Secure Handling
- Global Privacy and Data Protection
- Global Trade Compliance
- Personal Weapons in the Workplace
- Workplace Violence Prevention

# OUR SOCIAL RESPONSIBILITY



## WE ARE GOOD CORPORATE CITIZENS

Cubic strives to be a good corporate citizen in all aspects of our operations and activities. This includes respecting the laws and international norms banning the use of “conflict minerals,” which are minerals obtained from certain war zones in Africa, and any form of forced or child labor in our supply chain.

We recognize that significant adverse impacts may be associated with procuring minerals or goods containing minerals extracted from conflict-affected and high-risk areas. We also recognize that vulnerable people around the world are kidnapped, trafficked and exploited for labor and other services that may flow into a global supply chain.

As a responsible corporate citizen, we must respect human rights and refrain from business actions that contribute to the financing of conflict, or which support or encourage unlawful labor practices, human trafficking or indentured servitude. We will take all reasonable steps to ensure that our supply chains are free of conflict minerals and products made by workers subject to unsafe or unlawful working conditions or terms.

## WE CARE ABOUT THE ENVIRONMENT

Cubic has an obligation to follow environmentally sound business practices. This includes using resources efficiently, recycling waste and minimizing the short- and long-term impact of our products and operations on the environment.

Each of us must do our part to help preserve and protect our environment. In that regard, Cubic is committed to using only what we need and finding ways to do more with less. We maximize recycling and reuse materials. We make energy conservation and recycling a priority. And of course, we comply with the law and applicable environmental regulations in the country and locale where we work.

Every employee is encouraged to seek new and better ways to help us meet our commitment to running an environmentally conscious business.

## WE RESPECT THE POLITICAL PROCESS

Cubic respects the integrity of the political process, and we are committed to upholding the laws that govern our participation. Many countries, including the United States, prohibit corporations from donating corporate funds, goods or services directly or indirectly to political candidates at the federal level. This includes employees' work time. Local laws may apply as well.

We are also committed to being open about our lobbying activities, which are highly scrutinized and must be done in accordance with all applicable laws and company procedures. To ensure legal compliance as well as coordination of our political activities, before making a political contribution or any political or lobbying contact, initiative or communication on behalf of the company, please consult with Cubic's Legal Department.

Voluntary employee involvement in the political process is encouraged by the company, but participation must be on your own time and without the use of any company assets. If you plan to seek or accept public office, you must consult first with Cubic's Legal Department.

Eligible U.S. employees may participate in  **CUEPAC** which focuses on good citizenship and advancing Cubic's business interest. An employee's participation and decision to make contribution(s) to Cubic's political action committee is completely voluntary.



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ACTING WITH INTEGRITY AROUND THE GLOBE

2023