



CODE OF CONDUCT

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MESSAGE FROM THE CEO

When I founded York in 2012, I was determined to create a company that valued the work we'd execute. A company that not only rapidly evolves and deploys highly capable systems, but that does so with integrity and character. As we introduce our Code of Conduct, I want to be clear about why it matters and what I am asking of each of us. Our Code is a practical guide to the standards that keep York strong. It translates our values into everyday choices so we can move fast, do excellent work, and do it the right way.



How we perform our work is as important as performing it. Our customers and partners trust us to deliver with rigor and reliability. That trust is earned when we strive to protect information, avoid conflicts, and compete fairly.

Our Code brings consistency to those expectations so we can meet our obligations confidently and transparently, even under pressure and on tight timelines. We perform important work for our customers, including work that protects the warfighter and our country. They are counting on us to perform with integrity.

Being familiar with and complying with our Code supports corporate efficiency, a hallmark of York. True efficiency comes from clarity, discipline, and trust. When we work together as a team and do things the right way, we avoid rework, minimize distractions, and make better decisions. That is how we work to scale our impact and protect what makes York unique.

We enjoy a collaborative, team-driven work environment. This close collaboration depends on each of us choosing to act ethically, speak candidly, and show respect in our interactions...especially with one another. The purpose of our Code is to reinforce the kind of workplace where we can all do our best work. We expect professionalism, inclusive problem-solving, and mutual respect. If something does not feel right, raise it. Talk with your manager. Reach out to a company leader, the legal department, or our human resources team. Use our speak-up channels. Bringing issues to light is an act of partnership and ownership.

I ask each of you to read our Code, understand it, and keep it close. No one is expected to have every answer, but we are all expected to seek the right one. By living this Code, we protect our mission, strengthen our culture, and build a company we all want to work at -- one decision at a time.

~ Dirk Wallinger Chief Executive Officer York Space Systems

I. WHY WE HAVE THIS CODE

Our reputation and success depend on conducting business responsibly, fairly, and with integrity. This Code serves as a framework for the core ethical principles that guide business and personal conduct as a York Space Systems Inc. (“York” or “Company”) employee.

This Code applies to all York directors, officers and employees. All covered individuals have an obligation to familiarize themselves with this Code, Company policies, and applicable laws relating to their job responsibilities. If you have any questions or concerns about this Code, any Company Policy or applicable law or regulation, please contact the human resources department.

II. WE OPERATE WITH INTEGRITY

York is committed to operating to the highest ethical standards. By upholding these standards, we demonstrate our commitment to integrity, ethical standards and accountability and promote a culture that strengthens trust with our customers, suppliers, and one another.

a. Compliance with Applicable Laws, Rules and Regulations

All directors, officers and employees are responsible for knowing, understanding, and acting in a manner consistent with applicable Company policies and the laws that apply to their job responsibilities, whether or not identified explicitly in this Code. This includes compliance with the requirements of the contracts on which employees work. If you are unclear about any job requirement or responsibility, ask for help from your supervisor.

Violations of any law, rule and/or regulation may subject York to criminal or civil liabilities, and for individuals, disciplinary action up to and including termination of employment by the Company.

b. International Trade Laws

Export and import violations, and illegal boycotts, damage the trust and transparency necessary for honest and sustained business practices. York strives to comply with laws, rules and regulations governing export and import controls in both the United States and in the countries where the Company conducts business.

When delivering or receiving international products, technology, or services subject to the International Traffic in Arms Regulations (ITAR) or the Export Administration Regulations (EAR), employees need to be aware there may be additional steps required to maintain Company compliance to international trade laws. Additionally, there are laws and regulations that prohibit dealings with “sanctioned” or “embargoed” countries, governments, companies, and individuals.

Refer to PRC-2007-02-100-1 Export Compliance Manual and PRC-2009-01-100-1 Export Awareness Training for detailed guidance on how to comply with applicable laws and regulations regarding customs and trade. If you believe you need to transfer technology outside of the Company, including to a vendor, customer, or business partner, you must send an e-mail request to the technology control e-mail at technologycontrol@yorkspacesystems.com and send only after receiving approval.

c. Prohibiting Bribery and Corruption

York seeks to compete based on the quality and price of its products and services and to always obtain its government contracts based on merit. Offering, giving, soliciting or accepting bribes, either directly or indirectly, for the purpose of obtaining or retaining business or for receiving favorable treatment on government contracts is prohibited.

Employees are prohibited from engaging in any form of bribery or other corrupt practices, regardless of whether working with government or commercial entities. This expectation applies in both domestic and international settings.

d. Fairness in Government Contracting

We seek to gather information and learn about our competitors only through legal and ethical means. Our principles dictate that we uphold the law and not compromise our integrity to obtain non-public information, nor misuse proprietary or confidential information obtained from others.

Employees must not seek to obtain bid or proposal information or source selection from any source prior to the award of any government contract or subcontract to which the information pertains. Bid or proposal information includes competitors' cost or pricing information, cost build-up information, and information marked as "bid or proposal information" in accordance with applicable regulations. Source selection information includes competitors' proposed costs or prices, source selection and technical evaluation plans, evaluations of proposals, rankings of bids or proposals, reports and evaluations of source selection panels, boards or advisory councils, and any other information marked as "source selection information" in accordance with applicable regulations.

In addition, employees must refrain from seeking or obtaining from the government any other sensitive, proprietary, or otherwise improper information regarding a competitor of York or regarding a government procurement.

Failure to comply with these requirements can result in loss of the contract, suspension or debarment, and/or criminal liability for York and/or individual(s) involved. Any employee who believes that he or she has improperly received bid or proposal information, source selection or other confidential or proprietary information must refrain from using or disclosing the information and contact their supervisor and the legal department promptly.

e. Appropriate Gifts and Entertainment

York does not attempt to gain any business advantage by giving gifts or entertainment. No employee may offer, give, solicit, or accept any gift, gratuity, favor, meal, or entertainment to or from any third party that could influence, or appear to influence, business judgment or decisions. Cash and cash equivalents (such as gift cards) are also expressly prohibited.

Any gifts given to a third party must be in good faith, appropriate and reasonable, and comply with applicable Company policies, laws, and regulations. Employees who anticipate giving or receiving a gift shall review PRC-2199-00-100-01 Gifts and Entertainment Policy and obtain approval if required.

f. Political Activities and Lobbying

We encourage employees to participate in the political process as citizens and on their own time and at their own expense. Employees shall not suggest they speak for or on behalf of the Company when discussing any political or personal views or beliefs.

York is committed to comply with lobbying registration and disclosure requirements. All lobbying efforts are conducted through York's Vice President of Washington Operations. No employee or contractor may contact government officials for the purpose of influencing any law, regulation, or policy on York's behalf unless specifically authorized to do so. Lobbying and other political activities are highly regulated activities and violations may result in criminal penalties.

g. Compliance with Competition and Antitrust Laws

Antitrust and competition laws are designed to create a level playing field in the marketplace by prohibiting unfair business practices and promoting open and fair competition. At York, our products and services succeed in the open market without resorting to unethical or illegal business practices. We never engage in practices that would unfairly limit trade or exclude competitors from the marketplace.

Employees shall not communicate formally or informally with competitors to fix or control prices, allocate markets, boycott customers or suppliers, or limit the sale of products. Employees must operate in a manner that is both fair and honest and never take advantage through manipulation, concealment, abuse of proprietary or confidential information, misrepresentation of material facts, or any other unfair practices.

If you have a role with duties that may implicate antitrust or fair competition laws, you are responsible for knowing the laws that apply to your job responsibilities. Contact your supervisor if you are unsure on whether an action would be in violation of these laws or engage the legal department for guidance.

h. Safeguarding Confidential and Material Non-Public Information

Directors, officers and employees should maintain the confidentiality of information entrusted to them by the Company or by the government, its customers, suppliers or partners, except when disclosure is authorized or legally mandated or, in certain circumstances, permitted by law. Confidential information includes all non-public information (regardless of its source) that might be of use to the Company's competitors, or harmful to the Company or its customers, suppliers or partners if disclosed.

The Company is committed to complying with the Security and Exchange Commission's ("SEC") Fair Disclosure Regulation by safeguarding material, non-public information about the Company from selective disclosure. Information is considered "material" if there is a substantial likelihood that a reasonable investor would consider it significant in make a decision to buy, hold, or sell the Company's securities. See PRC-2200-00-100-01 Regulation FD Policy for information on the appropriate handling of non-public information.

i. Insider Trading

While working at York, you may have access to information not known to the public. Directors, officers and employees are prohibited from trading in stock or other securities while in possession of material nonpublic information. Directors, officers and employees

are also prohibited from recommending or suggesting to anyone else that they buy or sell stock or other securities based on nonpublic information. Insider trading can violate not only this Code but also the law, and any violations can result in severe civil and criminal penalties. Reference PRC-2201-00-100-01 Insider Trading Policy for additional information and guidance on this topic.

j. Proper Records Management

York maintains its Company records, accounts and financial documents in a manner that provides reasonable detail, appropriately reflects the matters to which they relate, and conform both to applicable legal requirements and Company policies. Directors, officers and employees are prohibited from making false or misleading business records, including time records. See PRC-2202-00-100-01 Time Recording Policy.

If you are responsible for preparing or maintaining any records for or on behalf of York, ensure compliance with your department's and York's requirements for creating, handling, and storing internal company documents and documents related to performance on government contracts.

k. Personal Conflicts of Interest

We are committed to making business decisions in the best interest of the Company and refraining from engaging in activities that create, or appear to create, a conflict of interest. A conflict of interest can occur when directors, officers or employees act in a way or have an interest that prevents them from performing their job responsibilities honestly, objectively, and fully.

Examples of a personal conflict of interest could be, but are not limited to, serving as a board member or director of a competing firm, holding financial interest in a competing company, being employed (including self-employed) in an occupation that competes with the Company, or having ownership, partnership, or personal involvement in supplier companies or distribution outlets related to Company business. See PRC-2203-00-100-01 Related Person Transaction Policies and Procedures for information and rules regarding business arrangements with family members and other related persons.

Loans by the Company to, or guarantees by the Company of, obligations of directors, officers, employees or their family members are of special concern. Loans by the Company to, or guarantees by the Company of, obligations of any director or executive officer (or their family members) are expressly prohibited.

No director, officer or other employee of the Company may, directly or indirectly, place, accept or otherwise participate in any bet, wager or prediction market transaction that is based on, references or derives value from, the performance, earnings, financial results or other material events of the Company or any other company with which the Company does business or that is involved in a potential transaction or business relationship with the Company.

Note that employees are generally discouraged from concurrent employment, as it can detract from an employee's time devoted to York and create a potential or actual conflict of interest. However, if you wish to hold a job or serve as a contractor outside of York, complete the EMP-5354-00-100-01 External Consulting Work/Concurrent Employment form and submit to the HR Board for review and decision.

For any questions on whether your current or future situation is considered a personal conflict of interest or would create the appearance of a personal conflict of interest, you should discuss the matter with your supervisor. If your question remains unresolved, refer the matter to the HR Board for a final determination.

l. Organizational Conflicts of Interest

An organizational conflict of interest (“OCI”) may exist where a contractor performs conflicting roles that could bias its judgment and/or create an unfair competitive advantage. By way of example, an OCI may arise where a contractor bids on a contract for which it has prepared the specifications or statement of work, is required to evaluate its own products or services, or obtains access to competitively useful non-public information that would provide it with an unfair competitive advantage in future procurements. When doing business with the government, whether as a prime contractor or a subcontractor, employees must comply with all applicable prohibitions and other requirements related to OCIs.

Reference PRC-2204-00-100-01 Organizational Conflict of Interest Training for additional guidance on how to identify and manage OCIs.

m. Corporate Opportunities

Directors, officers and employees are prohibited from taking for themselves personally (or for the benefit of friends or family members) opportunities that are discovered through the use of York property, information or position. Directors, officers and employees may not use York property, information or position for personal gain (including for the gain of friends or family members). In addition, no director, officer or employee may compete with York.

n. Fair Dealing

Each director, officer and employee must deal fairly with York’s customers, suppliers, competitors, partners, service providers, employees and anyone else with whom they have contact in the course of performing their job. No director, officer or employee should take unfair advantage of anyone through manipulation, concealment, abuse or privileged information, misrepresentation of facts or any other unfair dealing practice.

o. Financial Disclosures

York’s periodic reports and other documents filed with the SEC, including all financial statements and other financial information, must comply with applicable federal securities laws and SEC rules.

All officers, financial professionals and other employees at York who have financial reporting obligations must ensure that York’s books, records and accounts are accurately maintained. Each officer and employee must cooperate fully with the Company’s accounting and internal audit departments, as well as York’s independent public accountants and counsel.

Each such officer and employee must:

1. be familiar with and comply with York’s disclosure controls and procedures and its internal control over financial reporting;

2. take all necessary steps to ensure that all filings with the SEC and all other public communications about the financial and business condition of York provide full, fair, accurate, timely and understandable disclosure; and
3. avoid actions that could be perceived directly or indirectly as attempting to improperly influence York's internal or external auditors.

p. Employment Restrictions of Former Federal Employees

Employees must comply with all rules governing the recruitment, hiring, and use of current and former federal government employees and government consultants. If you are considering hiring or otherwise retaining the services of a current or former government employee, reach out to the legal department and human resources department for guidance to ensure compliance with the law and ethical standards. In general, any potential ethical problems or conflicts of interest that might arise from discussions with respect to the prospective employment and utilization of federal government employees must be resolved with the legal department in advance of hiring or utilization of the former government employee or consultant.

III. WE PROTECT WHAT IS ENTRUSTED TO US

York and its directors, officers and employees are entrusted with the responsibility to protect the assets of the Company and assets of third parties who have entrusted them to us. We are committed to safeguarding York's assets – whether physical property, information, or intellectual property – against misuse, loss, theft, or unauthorized disclosure.

a. Protecting the Privacy of Individuals

At York we value each other's privacy and comply with privacy laws and regulations. This includes compliance with requirements regarding handling of Personally Identifiable Information (PII) such as birth dates, social security numbers, driver's license numbers, individual medical information, or credit or debit transaction card information. If you receive information from a person or company of a type or in a manner that is inconsistent with the business relationship you have with that person or company, report the situation to Security and Legal.

b. Protecting York Information

York's intellectual property is a company asset that all team members must protect, as it is vital to maintaining our competitive advantage. As a director, officer or employee of York, you may have access to York's confidential information. Confidential information is any non-public information about York, including York's trade secrets. If you are an employee, you must comply with the Intellectual Property Rights and Non-Disclosure Agreement you signed when you joined York.

You also must look for and follow any document markings. Even information that is not expressly marked, however, could nevertheless give our competitors an unfair advantage and should not be shared outside of the Company. This includes financial information, details regarding our vendor relationships, information about our employee population (such as the number of employees), non-public photos or drawings of our space vehicles, and information regarding our workspace (such as our assembly area). Reference PRC-1981-02-100-1 Intellectual Property Protection Policy, for specific guidance on safeguarding intellectual property.

York also protects the use and distribution of its logo, images, artwork, and photographs. Employees are not permitted to use, reproduce, or distribute any York image without Company permission. After obtaining your supervisor's permission, you can submit a request to images@yorkspacesystems.com for final approval. You may not use a York image unless and until you receive final approval.

c. Protecting Others' Information

York protects the intellectual property entrusted to us by our commercial and government customers, suppliers, and other third parties with the same care we give to our own intellectual property. Any proprietary or confidential information generated or received for business purposes, whether belonging to York or any third-party, are only to be used for those business purposes. This includes controlled unclassified information which is information the government owns that requires safeguarding from public access.

Directors, officers and employees must comply with markings on all documents and understand their obligations when handling. In the event a document is not specifically marked, directors, officers and employees are expected to exercise good judgement as to best protect the information. When in doubt, employees are encouraged to contact their supervisor for guidance or, in the case of directors and officers, engage Legal.

If your job duties require access to supplier or customer information, you must ensure that you are familiar with applicable obligations and that you comply with them. You can e-mail nda@yorkspacesystems.com to inquire about any specific supplier non-disclosure agreements. Reference PRC-2042-00-100-01 Controlled Unclassified Information (CUI) Procedure, for detailed guidance on employee obligations surrounding controlled unclassified information.

d. Protecting Classified Information

York is entrusted to safeguard classified and other sensitive information that it acquires in connection with the work performed for government clients. As required by the terms of our government contracts and other applicable regulations, York makes this information available only to those who have obtained the appropriate government clearance or approval and only to those who have a business need to know the information.

Directors, officers and employees who possess a U.S. Government security clearance and require access to classified information or information systems must strictly comply with PRC-2031-05-100-01 Security Standard Practice Procedures, all applicable security laws or regulations, and all required training.

Any employee who observes or gains knowledge of a potential violation of this policy or any other security law or regulation relating to classified information or information systems must promptly report it to the Director of Security.

e. Responsible Use of Artificial Intelligence

Artificial Intelligence (AI) is a rapidly evolving capability that provides tremendous potential benefits for the Company and its customers. However, AI models, tools, and data sets, as well as AI-generated content, also present significant potential risks to the security of Company and third-party data and the integrity and accuracy of work product. All employees must comply with PRC-2194-00-100-01 AI Governance Policy with respect to any actual or contemplated use of artificial intelligence tools.

f. Proper Use of Company and Customer Property

We must always protect and ensure proper use of all Company and Customer property. This includes IT systems, networks, and applications. The damage, destruction, abuse and/or waste of property has an impact on York's financial performance as well as its reputation and must be avoided. Each director, officer and employee shares in the responsibility to ensure property is managed with the highest standards of care.

- **Company property**, including credit cards, should be used for legitimate business purposes only and not for any personal benefit or the personal benefit of anyone else. Reference FRM-1849-05-100-01 Company Credit Card Expense and Travel Policy, for additional guidance on the appropriate use of company credit cards.
- **Customer property**, which includes government property, shall only be used for the purpose in which it was acquired or furnished for and for no other purpose unless permission is granted in writing by an authorized Customer representative. For questions related to government property contact the Director of Government Contracts.

Employees are also required to comply with PRC-2011-01-100-1 Electronic Communications Plan, which describes processes and procedures for protecting our communications systems from unauthorized access and for meeting other operational security requirements.

IV. WE COMMUNICATE RESPONSIBLY

a. No Public Release of York Information

Only York's public relations team or employees who have expressly been designated by York public relations to represent and/or speak on behalf of the Company are permitted to do so. Any media questions or outreach should be directed to PR@yorkspacesystems.com.

Any public speaking or writing in which you would like to mention York, including the fact that you work for York, must be approved by the public relations team in advance. Examples of activities requiring approval include, but are not limited to, conference faculty participation, a speech, a presentation, panel participation, a blog, or other written article or commentary.

Process: Employees must first present the proposed communication to their supervisor. If your supervisor recommends approval of the communication, you may then submit a brief summary of the opportunity and the information you intend to disclose to PR@yorkspacesystems.com for consideration. You must not disclose any information about York until you have received a recommendation from your supervisor and approval from the public relations team.

Even if a public speaking or writing opportunity is approved as required by this policy, unless you are expressly designated to speak on behalf of York as discussed above, you must state in your communication that you are speaking only on behalf of yourself and that any opinions or statements are yours and not York's.

b. No Public Release of Program Information

The unapproved public release of program information may negatively impact our reputation and could lead to the Company's facing potential legal and regulatory penalties.

Employees must not publicly disclose any information about our programs. Only the York public relations team or employees who have expressly been designated by York public relations to disclose program information are permitted to do so. Examples of program information include, but are not limited to, project details, photos or drawings of customer property, project schedules, technical reports, or sensitive customer communications.

Questions should be posed to PR@yorkspacesystems.com.

c. Social Media Use

Social networking sites hosted outside of York's protected network must never be used for internal communications among fellow employees or for the conduct of York business. Do not use your York Space Systems email addresses to register on social networks, blogs or other online tools that are for personal use. Employees may use professional online networking forums, such as LinkedIn, as long as such use is consistent with York policies.

Keep in mind that ultimately you are solely responsible for what you post online. Do not use social media to disclose any York proprietary information or internal company matters, such as program, customer, or vendor identity or information. Do not use social media to comment on rumors, such as potential transactions or contract awards. Do not post any material that would violate your Employee Intellectual Property Rights and Non-Disclosure Agreement. You are far more likely to resolve a complaint or concern by speaking directly with your coworker, manager, or human resources than by posting it to a social media outlet. Think before you post, and if you do, be respectful, honest, and accurate.

If a York news story has already been posted, you may tag or repost it as long as the reposting is consistent with our policies.

Violations of this policy, or online conduct that adversely impacts your job performance, the performance of coworkers, customers, suppliers or others who work on behalf of York's legitimate business interests, may subject employees to disciplinary action, up to and including termination of employment.

V. WE PROVIDE A HEALTHY AND SAFE WORKPLACE

At York, our team is committed to providing its employees with a safe, healthy, and respectful workplace. This means maintaining a work environment that is free from safety hazards, harassment, violence, and discrimination. We enable this safe workplace through proactive training, strict adherence to safety standards, and fostering an inclusive environment.

a. In-Office Policy and Leaves

We do our best work when we do it together, in-person, maximizing our ability to collaborate and benefit from our colleagues' energy and expertise. If a supervisor

believes that remote work for an employee is necessary to meet a critical business need, the supervisor may complete FRM-2585-00-100-01 Request for Approval for Remote Employee and the HR Board will consider the request. Per PRC-2205-00-100-01 In-Office Work Policy, remote work is disfavored and may be granted only in very limited circumstances.

Employees have several options available when they need or want time away from work. See PRC-2206-00-100-01 Leaves Policy for detailed information on Paid Time Off, Sick Leave, federal FMLA leave, Colorado FAMLI leave, Maryland Paid Family and Medical Leave, when available, and leave for military members (USERRA).

b. Drug-Free Workplace

No employee is permitted to be under the influence of alcohol, illegal drugs, or other unauthorized controlled substances while on Company premises or conducting Company-related work offsite. Furthermore, the unlawful manufacture, distribution, possession, purchase, consumption, use, or sale of controlled substances on Company premises or while conducting Company business is prohibited.

Employees are not prohibited from lawfully using and possessing prescribed medications. Employees must, however, consult with their doctors about the medications' effect on their fitness for duty and ability to work safely and promptly disclose any work restrictions to their supervisor.

Employees may responsibly consume alcohol when provided by the Company during Company-sponsored events. Alert and rational behavior is required for the safe and adequate performance of job duties. Reasonable suspicion testing for alcohol or controlled substances may be directed by York for any employee when there is reason to suspect that alcohol or controlled substance usage may be adversely affecting the employee's job performance or that the employee may present a danger to the physical safety of the employee or another. Any employee convicted of a criminal drug violation must report it to the human resources department at HR@yorkspacesystems.com within ten (10) days.

York is a smoke-free environment. Smoking is prohibited within all areas of the building and within 50 feet of the main entrance into the building. Employees may smoke in designated outdoor areas. This restriction applies to all employees and visitors, at all times, including non-business hours.

A violation of the Drug-Free Workplace policy will subject an employee to disciplinary action, up to and including termination of employment.

c. Workplace Safety

Each employee is responsible for ensuring their work is performed in a safe, efficient manner that complies with federal, state, and local safety and health laws and regulations. Employees must complete by the due date all safety training assigned to them by their supervisors and, if they hold any kind of workplace certification, meet all requirements necessary to maintain the certification. Employees must adhere to all workplace safety rules and procedures. Stop work and contact your supervisor if you feel that your job duties cannot be done safely.

If you are injured on the job, you must report it to the human resources department at HR@yorkspacesystems.com within four (4) days. A human resources team member will provide guidance on York's worker's compensation process.

d. Respecting Human Rights

York strives to respect human rights and is committed to fighting human trafficking, trafficking-related activities, child labor, and forced or indentured labor. We also expect our business partners to share this commitment.

Employees are prohibited from engaging in conduct that contradicts this commitment. Prohibited conduct includes procuring commercial sex acts, using forced labor, using misleading or fraudulent recruiting practices, or using recruiters that do not comply with local labor laws in the country that any recruiting takes place.

Should you encounter a situation that you believe involves the trafficking of persons, including trafficking-related activities, promptly report it using the Reporting Violations policy of this Code.

e. No Violence

All employees should expect to feel safe while working for York. York does not tolerate any type of violence committed by or against an employee, inside or outside of the workplace. Additionally, the carrying of weapons onto Company premises or its surrounding areas is strictly prohibited.

If you experience or observe an act of violence, you must report it promptly in accordance with the Reporting Violations policy of this Code to bring the incident to the Company's attention. If you believe a serious threat of imminent harm exists, contact law enforcement and then report the incident in accordance with the Reporting Violations policy of this Code.

f. Prohibition on Discrimination and Harassment

York is dedicated to the principles of equal employment opportunity and makes employment decisions based on qualifications and performance. York prohibits unlawful discrimination and harassment against applicants or employees based on age, race, sex, color, religion, creed, national origin or ancestry, pregnancy, physical or mental disability, military or veteran status, sexual orientation, gender identity, or any other status protected by applicable state or local law. See PRC-2207-00-100-01 Prohibition on Discrimination and Harassment Policy for further details.

York also prohibits retaliation against anyone making a good faith complaint of discrimination or harassment or participating in an investigation or proceeding related to such a complaint. Employees should report any violations using the Reporting Violations policy of this Code. York will promptly investigate such reports, and, if warranted, take prompt corrective action.

g. Workplace Accommodations

York will make reasonable accommodations for employees who qualify for accommodations under applicable laws. Reference to PRC-2208-00-100-01 Accommodations Policy for further details.

VI. WE ARE ACCOUNTABLE FOR OUR ACTIONS

Each director, officer and employee shares in the responsibility to adhere to this Code and applicable laws and regulations. Our team maintains clear and accessible channels for reporting concerns or potential violations without the fear of retaliation. In addition, when misconduct occurs, we are committed to addressing it promptly and fairly through appropriate corrective and disciplinary actions.

a. Training

York maintains a training program for this Code that is designed to ensure that all directors, officers and employees understand and can adhere to applicable laws, regulations, and this Code. Employees are required to participate in this training via the Company's official training platform and electronically acknowledge compliance with this Code as required.

b. Audit Cooperation

York is audited by external organizations on its business operations. Our cooperation with external auditors is essential to validate the Company is meeting its regulatory and contractual standards. Employees may be asked to participate in such audits.

Any request to support an audit or investigation from a third-party must be immediately directed to the legal department and other impacted stakeholders such as programs or the finance department. Employees should never attempt to provide any response to an audit or other investigation requests on their own.

c. Reporting Violations

Each director, officer and employee has a duty to help the Company enforce this Code and to report suspected or known violations in a timely manner, even if the violation may not have been intentional. Directors, officers and employees must also promptly report suspected or known violations of any laws, rules, regulations or other Company policies. Failure to disclose a suspected or known violation is considered a violation of this Code.

Process: York encourages transparency and early and open discussion of questions and concerns. Please first discuss any concerns with your supervisor promptly and completely, as your supervisor is often the most appropriate person to understand and respond. If you do not feel comfortable speaking about a concern to your supervisor, or if your concern involves your supervisor, you may report the concern to the human resources department at HR@yorkspacesystems.com or by speaking with a member of York's leadership team. For human-trafficking concerns, you may also contact the National Human Trafficking Hotline at 1-888-373-7888 or by texting "HELP" to 233733. Actions prohibited by this Code involving directors or executive officers may be reported to the Audit Committee of the Board of Directors.

Reports can be made anonymously at our third-party managed website at www.corporatecompliancepartners.com/yorkspacesystems or by calling the third-party

managed Hotline at 844-469-0587. If the Company receives a report, it will promptly and reasonably investigate and, if the report is validated, take appropriate remedial action. Refer to PRC-2214-00-100-01 Audit Committee Procedures for Handling Reports of Potential Misconduct for additional information.

d. No Retaliation

York prohibits retaliation against any director, officer or employee who in good faith reports a concern, assists another employee in doing so, or participates in any review or investigation of a report or complaint. Anyone who violates this nonretaliation policy is violating this Code. If you believe you have been the victim of or witnessed retaliation, please report it using the reporting violations process in this Code.

e. Consequences of Violations

Enforcement of this Code and other Company policies is necessary to ensure York remains a comfortable, engaging, and enjoyable place to work. Violations of this Code or any laws, rules, regulations or Company policies, even in the first instance, may expose employees to disciplinary action, up to and including termination of employment.

The appropriate corrective action for any situation will be evaluated and determined based on the relevant facts and circumstances. Corrective action can range from verbal coaching to termination and will be handled by your supervisor and the human resources department on a case-by-case basis. Certain violations of law or regulation may lead to fines and criminal penalties in addition to any discipline imposed by York.

Additional measures may be taken if improper conduct is made in connection with the award, performance, or closeout of any government contract as York has mandatory government contract reporting requirements when unethical or unlawful behavior is suspected or known to be connected with a government contract. Violations in connection with a government contract may result in penalties such as the suspension or debarment of individuals or the Company from working on future government contracts as well as, for the Company, the termination of current or pending government contracts.

f. Separation of Employment

York asks that employees who wish to resign their positions provide sufficient notice for the efficient and effective transition of their work responsibilities to other employees. Two (2) weeks is typical. If you provide notice of resignation, you will be scheduled for an exit interview, at which point you will return your York laptop, York cellphone, and any other York equipment, documents, or information. Do not delete any material from York equipment before returning it, including text messages or voicemails.

The Intellectual Property and Non-Disclosure Agreement (NDA) employees signed when joining York remains in effect after resignation. By signing the NDA, employees promise that after their employment with York they will not “use any Confidential Information or disclose any Confidential Information to any person or entity who is not specifically authorized by the Company to receive it.”

Employment with York is at-will. Either the employee or management has the right to terminate the employment relationship at any time, with or without notice, with or without cause, for any reason allowed by law. No one other than York’s CEO has the

authority to enter into an agreement for employment for any guaranteed period of time. Neither this Code nor any verbal statement from anyone at York is intended to create a contract of employment for a specific period of time.

Even though York asks that employees give sufficient notice of resignation, employees are not guaranteed continued employment and pay through the notice period. Consistent with at-will employment and in its sole discretion, York may elect to end the employment relationship before the end of the employee's desired notice period.

VII. WAIVERS

The Board of Directors, in the case of a violation by a director or executive officer, or the Chief Legal and Administrative Officer, in the case of a violation by any other person, may, in its discretion, waive any violation of this Code.

Any waiver for a director or an executive officer shall be disclosed as required by SEC and New York Stock Exchange rules.

VIII. DISCLAIMER

This Code of Conduct provides general information about working at York. It is not all inclusive but is intended to provide employees with a summary of the Company's requirements, expectations, and guidelines. This Code replaces the former York Employee Handbook and all previous versions of the Code.

Except for the at-will nature of the employment, the Company reserves the right to suspend, terminate, interpret, or change this Code, to the extent permitted by law, along with any other procedures, practices, benefits, or other programs of York, at its discretion. These changes may occur at any time, with or without notice.

IX. ACKNOWLEDGEMENT OF RECEIPT AND REVIEW

I, _____ (name), received, read and understand York's Code of Conduct and agree to comply with it.

Signature: _____

Printed Name: _____

Date: _____