



ADVANCING
& ENHANCING
THROUGH TRUST

SAIC CODE OF CONDUCT SUMMARY

SAIC[®]

MESSAGE FROM OUR INTERIM CHIEF EXECUTIVE OFFICER

At SAIC, we impact globally important missions. By advancing technology and innovation, we serve and protect our world. Alongside this opportunity, we have a duty to deliver on our commitments and uphold our values of integrity, inclusion and innovation.

INTEGRITY

Companies thrive or fail based on their reputations. Customers choose SAIC for our experience, expertise and innovative solutions to their complex challenges. They also trust us because we consistently deliver with integrity. Simply put, our customers know they can rely on SAIC to do the right thing.

Our Code of Conduct embodies this commitment. In our highly regulated environment, adherence to specific rules is crucial. Our ongoing success depends on every employee, partner and board member understanding and following our Code of Conduct. A single lapse in judgment can severely harm our business, reputation and the livelihoods of our employees and their families.

Integrity defines SAIC. Speak up if something doesn't seem right or if you have questions.

INCLUSION

At SAIC, inclusion is a core value that enhances our innovation. We believe diverse perspectives lead to better ideas and outcomes. Everyone at SAIC is valued and respected, regardless of their background or role. We are committed to an environment where all contributions and viewpoints are encouraged.

This commitment extends to our interactions with customers, partners and communities. By fostering an inclusive culture, we boost creativity, strengthen problem-solving and better meet stakeholder needs.

INNOVATION

Innovation is central to SAIC's mission to solve complex challenges. Our creative thinking and boundary-pushing enable us to deliver impactful, cutting-edge solutions. We foster continuous improvement and always seek new ways to innovate.

Our culture values curiosity, experimentation and learning from success and failure. By embracing new technologies, methodologies and perspectives, SAIC stays at the forefront of our industry, delivering value to customers and society.

DOING THE RIGHT THING

At SAIC, our values guide our decisions, interactions and success. By upholding these values, working together, respecting one another and doing the right thing, we drive SAIC forward as an industry leader and a source of pride.

Jim Reagan
Interim Chief Executive Officer



PURPOSE, MISSION, VISION, AND VALUES

We are all stewards of SAIC's ethical culture. Our purpose, vision, mission, and values are the drivers of our culture and commitment to each other, our customers, and our stakeholders. They set our direction and intent in all we do.



INTEGRITY

Demand unwavering honesty, ethics and authenticity in yourself and others.



INNOVATION

Empower our people to take appropriate risks and leverage emerging technology to solve our customers' most complex problems.



INCLUSION

Respect and value our people and passionately partner with our customers and our communities.

COMPLIANCE WITH THE CODE

Our Code of Conduct sets the standards for business conduct expected from all employees, officers and directors, based on SAIC values and conduct standards. These elements guide our daily behaviors, mutual commitments and business practices.

Our Code of Conduct mandates that waivers to the Code for executive officers or board directors may only be granted by the Board or its Nominating and Governance Committee and must be communicated to shareholders, detailing the rationale behind the waiver. This disclosure will be made within four (4) business days through a Form 8-K filing with the Securities and Exchange Commission (SEC), a website disclosure compliant with Item 5.05(c) of Form 8-K, or, if Form 8-K is not applicable, via a press release.

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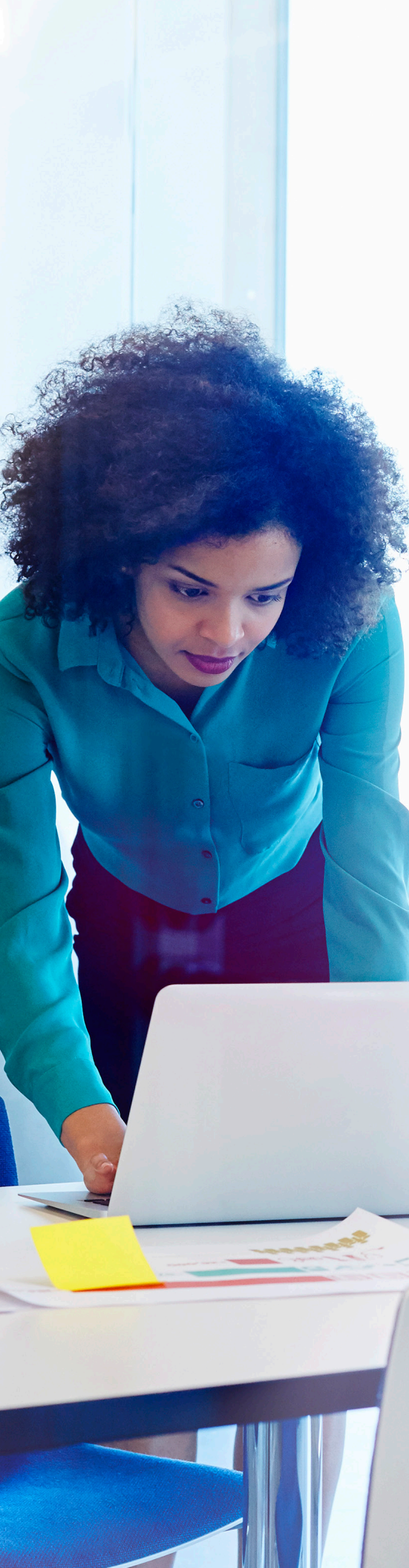
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WE DEMONSTRATE **INTEGRITY**

We Support a Speak Up Culture

At SAIC, we uphold a Speak Up Culture, ensuring all issues can be discussed without fear of retaliation. If we become aware of a violation of SAIC's Code, policies, instructions or any law or regulation, we must report it using any of SAIC's disclosure channels, including anonymous options if necessary.

**REPORTING
HELPLINE**
888.247.1764

**ONLINE
SUBMISSION**
saicintegrity.com

**MANAGER/
MANAGEMENT
CHAIN**

**HR BUSINESS
PARTNER**

**ANY ETHICS
OFFICE MEMBER**

**THE SECURITY
OFFICE**

**THE GENERAL
COUNSEL**

THE CEO

**THE BOARD OF
DIRECTORS**

We Lead with Integrity

We support leaders as they set the example of integrity each and every day. Leaders are most successful when they foster an “open door” culture where all employees feel free to voice opinions, ideas, and concerns. Everyone’s voice matters.

We Participate in Training

Our industry is governed by very specific rules, and each one of us has a responsibility to understand and abide by them. SAIC’s required training equips us with the skills, knowledge, and understanding to anticipate ethical challenges, recognize potential dilemmas, and make sound decisions.

We Report Our Time Honestly and Accurately

Each of us has an obligation to our customers and to the company to ensure timecharging is performed in a manner that is complete, accurate, and timely. Proper timecharging demonstrates our commitment to integrity. All employees are responsible for understanding and complying with timecharging policies and reporting errors or violations. **Charge it all, charge it right, charge it daily.**

We Participate Appropriately in Political Activities

We encourage employees to participate in the political process, but laws governing contributions and company participation are complex. Certain states and localities have enacted so-called pay-to-play laws that restrict SAIC’s ability to make or solicit political contributions in those jurisdictions.

We Do Not Engage in Insider Trading

As a publicly traded company, SAIC provides full and fair public disclosure on a timely basis of any activities that would materially affect the value of SAIC’s stock, options or any of its securities. As part of your work, you may have access to information about these activities, or similar information about another company, before it becomes public knowledge. Until it is released to the public and the public has time to react to it, this knowledge is considered material, non-public or “insider” information and must be kept confidential. If you are in possession of material non-public information, you cannot buy or sell SAIC shares. The penalties for insider trading include significant fines and/or incarceration time.

We Value Fair Competition

We comply with all antitrust and fair competition laws in the United States and in other countries where we do business. Supply and demand and vigorous competition give our customers quality services at fair prices.



— “ —
We are fair and honest in our dealings with customers, suppliers, and employees
— ” —

We avoid improper discussions or agreements that violate U.S. or Global antitrust laws and/or the Procurement Integrity Act. We know that if we come in contact with competitor proprietary information, we must not share it and are to immediately report it to the appropriate disclosure channel.

We Use Assets Responsibly

In addition to proprietary information and intellectual property, our company assets include other resources provided to us to perform our duties. We are responsible for keeping company assets safe from misuse, loss, damage or theft and to only use them for legitimate business purposes. We are good stewards by maintaining company assets with care and preventing waste and abuse. We employ appropriate information technology (IT) security safeguards and do not share customer or SAIC proprietary information to personally owned devices, personal email addresses or web storage services. Our personal use of company assets is limited and in line with our policies and security requirements.

We Keep Accurate Business Records and Communicate Honestly to the Public

We adhere to the highest standards in our business practices – that includes preparing all business records completely and accurately and communicating that information openly and honestly. At no time do we misrepresent facts or falsify or alter our records and data. Individuals and entities rely on our records to make evaluations about our business and their future interactions with us.



We Manage Personal Conflicts of Interest

We are all involved in activities outside of work, but we must avoid participating in activities that conflict or appear to conflict with the interests of SAIC. A personal conflict may also arise when SAIC hires the relative of a current employee or does business with a company in which an employee's family member or close associate is involved. A personal conflict of interest arises when an employee's private interests conflict with their responsibilities to SAIC or its customers. We may not realize when our loyalties are divided. Even the mere appearance of a conflict can damage our ethical credibility. That's why it's important to disclose even potential conflicts of interest so they can be objectively reviewed and approved.

We Manage Organizational Conflicts of Interest

We have a responsibility to avoid, neutralize or mitigate Organizational Conflicts of Interest (OCI) to prevent unfair competitive advantages. An OCI can occur when we are unable to provide impartial assistance or advice to the Government or our objectivity in performing the contract work might be impaired.

We Avoid Conflicts of Interest with Government Employees

We comply with all applicable statutes and regulations regarding potential employment of former government employees. We honor any post-government restrictions that we or our colleagues may have. We ensure any employment discussions with current government employees are conducted only after they have met their disclosure and recusal obligations.

We Protect Information and Intellectual Property

We owe it to ourselves to safeguard our company's assets; this includes tangible items as well as intellectual property (IP) and proprietary information. IP refers to creations of the mind and includes new inventions, technical data and computer software, research and processes, creative written works and branding items. Proprietary information is important, possibly sensitive information that the company owns and wishes to keep confidential, and it usually gives us a competitive advantage in our market.

We Protect the Privacy of Others

SAIC often collects Personally Identifiable Information (PII) or Protected Health Information (PHI) about employees, contractors, suppliers and customers. When handling this information, we must follow SAIC's standard practices carefully. Everyone is entitled to the safe collection, use and storage of their PII and PHI, as protected by federal, state and local privacy laws.





We Protect Sensitive and Classified Information

We help our customers execute our country's most important missions. We are vigilant in our responsibility to guard sensitive and classified information with which we are entrusted while serving our customers. We are alert to any potential disclosure of sensitive or classified information whether intentional or not.

We Don't Offer, Make, or Accept Bribes

At SAIC, we never offer, request or accept bribes or kickbacks to influence decisions. We comply with U.S. and global anti-corruption laws, such as the Foreign Corrupt Practices Act (FCPA), and avoid any actions that might create a perception of impropriety.

We Accept and Provide Only Appropriate Gifts and Entertainment

We only give or accept business courtesies that are for business purposes, are modest and infrequent and are not prohibited by law or the policies that apply to all parties involved.

Certain gifts and entertainment can erode others' trust in SAIC and must be avoided. These include any gifts or entertainment that might appear to be bribes, raise questions about conflicts of interest for you or SAIC or would damage SAIC's reputation.

We Respect International Trade Requirements

The U.S. Government controls the import, export, and release of certain products, services and technical data to foreign persons or foreign entities. We are all responsible for complying with all export and import laws. We never conduct marketing activities, release technical information to the public or participate in the sale or purchase of products or services contrary to applicable U.S. regulations.contrary to applicable regulations.

WE FOSTER INCLUSION

We Create a Respectful Work Environment

SAIC's culture reflects how we treat our customers, the public and each other. We aim to maintain an ethical, respectful environment by treating everyone with dignity, fairness and courtesy. We value all contributions and ensure a workplace free from harassment, discrimination and retaliation. Our collective success depends on the ability of each of us to perform at our best. If we engage in behavior that threatens our respectful work environment, it creates barriers that prevent us from reaching our full potential.

We Maintain a Safe and Healthy Work Environment

We are committed to providing a safe and healthy work environment at SAIC. This means we speak up if we see or hear anything that could pose a threat to safety or security, damage company real estate or personal property or create an unsafe working condition. We are proactive in protecting the company and each other from unplanned emergencies through the utilization of our Corporate Incident Response Plan and our Site-Specific Incident Response Plans.

We Maintain a Drug-Free Workplace

To maintain a safe work environment, we must not be under the influence of drugs, controlled substances or alcohol at work. As a U.S. federal contractor, SAIC complies with the Drug Free Workplace Act and local laws. Being under the influence jeopardizes safety and the quality of our products and services.

We Respect Human Rights

Respect for human rights is central to SAIC's business practices. We comply with regulations against human trafficking and local laws, promoting fair wage and labor practices. We expect our partners and suppliers to uphold similar commitments. Protecting and advocating for human rights maintains our commitment to our values and creates a safer environment for all.

We Are Good Corporate Citizens

SAIC leverages the talent and passion of our employees and their families to give back to our communities. We partner with nonprofits that align with our employees' interests and are dedicated to reducing our environmental impact.

Our philanthropic pillars include veterans, STEM and community well-being. We inspire future scientists and engineers, support military families and promote cultural awareness through community service. Corporate responsibility is a core part of SAIC's culture.

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— “ —
Our reputation
is built upon the
high quality of
work each of
us does for our
customers

— ” —

WE DELIVER INNOVATIVE SOLUTIONS

We Use Our Best Judgment When Posting

While SAIC does not limit our personal use of social media, it is important that we each use our best judgment while online. Posting non-public or confidential information on social media, or giving the appearance that our personal posts represent SAIC, can damage our reputation and even have legal implications. Always consider how your actions online can help or harm SAIC and its reputation, as well as your own, and how it aligns with SAIC's values.

We Ensure the Quality of Our Products and Services

Our mission to be the leading government services and solutions provider means we have an uncompromising commitment to provide our customers the highest level of performance, while delivering quality technical services and solutions that meet their requirements at the agreed upon price and within schedule.

SAIC senior management and staff strongly support the continual improvement of the Quality Management System, including our quality objectives and the processes by which we provide our products and services, so that our work meets requirements and is done right the first time.

We Develop and Use AI Responsibly

At SAIC, we recognize the transformative power of artificial intelligence (AI) and its potential to drive innovation and improve lives. We strive to evaluate AI systems iteratively against emerging ethical considerations, to mitigate bias and unfairness, to be transparent about the use of AI technologies, to design and use reliable AI Technologies, and to adhere to applicable privacy laws and regulations. We are committed to ongoing learning and improvement in AI ethics, and we implement security measures to safeguard data throughout the AI lifecycle. We aim to foster trust, respect and responsible innovation in the development and use of AI technologies throughout our organization.

CONCLUSION

All of us, from front-line employees to senior executives and board members, are stewards of SAIC's ethical culture. Maintaining a culture of integrity depends on our understanding of the rules and ability to hold ourselves accountable to the standards outlined in our Code. When the rules do not provide sufficient guidance for a particular issue, we ask questions and choose actions that best embody our core values and business standards.



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