



TELOS CORPORATION

Code of Ethics and Business Conduct

Senior Financial Officers Including Chief Executive Officer

The directors, officers and employees of Telos Corporation (Company) are committed to conducting business in a manner that is at once lawful, ethical and fair to each of its constituencies, including shareholders, customers, employees, suppliers, and the public. The Company's Chief Executive Officer (CEO), Chief Financial Officer (CFO), Controller, and other employees of the Company's finance and accounting department hold an important and elevated role in corporate governance in that they have the responsibility and authority to ensure that these standards are enforced in the operation of the Company's financial structure. In particular, the senior financial officers, including the Chief Executive Officer, will exhibit and promote professional integrity by:

- Always conducting oneself with honesty and integrity;
- Disclosing any actual or apparent conflicts of interest between personal and professional relationships, and avoiding any actual or apparent conflicts of interest if the relationship is deemed to conflict with the best interest of the Company;
- Providing complete, accurate, fair, timely and understandable information in public filings, including in documents submitted to the U.S. Securities and Exchange Commission and other government agencies;
- Complying with all applicable laws, rules and regulations of federal, state, and local governments and agencies;
- Acting in good faith, with competence, diligence, and due care, and promoting such ethical conduct among peers and all employees; and
- Promptly reporting any violation of this Code of Ethics to their supervisor, another responsible member of management, the General Counsel, or through the whistleblower hotline listed on the Company's internal website and employee handbook;

Any violation of this Code of Ethics may result in disciplinary action, up to and including termination of employment. Officers and employees subject to this Code of Ethics are also expected to abide by the policies, procedures, standards and guidelines set forth in the Company's Code of Ethics and Standards of Conduct as well as in the employee handbook.

This Code of Ethics is intended to be the written code of ethics required under Section 406 of the Sarbanes-Oxley Act of 2002 and the standards of Securities and Exchange Commission Regulation S-K Item 406.