

CODE OF BUSINESS CONDUCT OF THE BOARD OF DIRECTORS

Ethics and integrity of action are core values at Leidos. This document establishes the code of business conduct of the directors of Leidos and reflects their commitment to pursue the highest standards of ethical conduct. This Code is intended to describe areas of ethical risk, provide guidance to directors and help reinforce a culture of honesty, accountability, and responsible governance in a dynamic regulatory environment.

This Code is adopted in compliance with Section 406 of the Sarbanes-Oxley Act of 2002, the rules and regulations of the U.S. Securities and Exchange Commission ("SEC"), and Section 303A.10 of the New York Stock Exchange ("NYSE") Listed Company Manual.

Directors are expected to read, understand, and comply with this Code. In addition, directors shall acknowledge receipt and understanding of this Code upon initial appointment to the Board of Directors and on an annual basis thereafter. The Company shall provide periodic training to directors regarding the provisions of this Code and other applicable legal and regulatory developments.

Conflicts of Interest

Directors should avoid any conflicts between their own personal or business interests and the interests of Leidos. A conflict of interest can arise when a director takes actions or has interests that may make it difficult to perform his or her work for Leidos objectively and effectively, or when a director, or a member of his or her immediate family* receives improper personal benefits as a result of his or her position as a director of Leidos. Even the appearance of a conflict of interest should be avoided.

If a director becomes aware of an actual, perceived, or potential conflict of interest with Leidos, he or she should promptly inform the Chair of the Corporate Governance and Ethics Committee and the Corporate Secretary and provide updates as circumstances evolve. If the director's independence could be impaired, the director should also notify the Chair of the Board and the Chair of the Corporate Governance and Ethics Committee, and the Corporate Secretary to consider what action, if any, may be required. In the case of a material conflict of interest, the director may be required to tender his or her resignation.

* The New York Stock Exchange rules define "immediate family" to include a director's spouse, parents, children, siblings, mothers-in-law, fathers-in-law, sons and daughters-in-law, brothers and sisters-in-law, and anyone (other than a domestic employee) who shares the director's home.

Some of the more common conflicts that directors should avoid are listed below:

- **Relationship with third-parties doing business with Leidos.** Directors may not receive a personal benefit (e.g., gifts, entertainment, travel, loans, favorable pricing, consulting fees, investment opportunities) from a person or firm that is seeking to do business with Leidos. A director should disclose the conflict and then recuse himself or herself from any Board decision involving another firm or company with which the director has a business relationship.
- **Compensation from non-Leidos sources.** Directors may not accept payment from a third party for services performed for Leidos
- **Personal use of Leidos assets.** Directors may not use Leidos information or assets (including employee labor) for their own personal benefit unrelated to their role as a Leidos director.
- **Gifts.** Directors may not offer, give or receive gifts from those who deal with Leidos where the gift is being made to influence the directors' actions as members of the Board, or where acceptance of the gift could create the appearance of a conflict of interest.
- **Investments or advisory roles.** Directors should avoid conflicts arising from investments, including private equity, venture capital, or advisory relationships, particularly where such interests involve customers, suppliers, competitors, or emerging technology companies relevant to Leidos' business.
- Directors must not take for themselves, or their companies business, opportunities that they learn about as a director of Leidos and must not compete with Leidos for business.

Confidentiality

Directors must maintain confidentiality of information not generally known to the public and entrusted to them as directors. Directors may disclose such information only when (a) authorized by the Board or the General Counsel, (b) required by law, regulation, or legal process, or (c) made to the Company's legal, financial, or other professional advisors who are bound by confidentiality obligations. Any director who is uncertain whether a disclosure is permissible should consult the General Counsel before making the disclosure. Directors may not use confidential or material non-public information obtained through their role for their personal benefit or to benefit others, in any form. This prohibition applies regardless of the mechanism used to exploit such information, including participating in wagering, betting, prediction markets, or similar activities based on such information.

This obligation includes safeguarding confidential information in accordance with applicable cybersecurity, data protection, and export control requirements.

Directors shall promptly report any known or suspected data breach, cybersecurity incident, or unauthorized access to confidential or personal data to the General Counsel or the Chief Information Security Officer

Compliance with Laws, Rules and Regulations

Directors must comply with laws, rules and regulations applicable to their role as a director of Leidos, including the following:

- **Insider Trading.** Directors are expected to comply with Leidos' Insider Trading and Disclosure Policy and applicable laws prohibiting trading in securities of Leidos or its business partners if the director possesses material, non-public information.
- **Recruitment of Government Personnel.** A director's discussions with current or former federal government employees, including military personnel, must comply with applicable restrictions on recruiting them to work for Leidos or serve on Leidos' board.
- **Participation in the Political Process.** Directors are expected to conduct their political activities and interactions with government officials in accordance with applicable law. Certain states and localities have "pay-to-play" laws, which may restrict and/or require disclosure of political donations by Leidos, its employees, or its directors. These laws may also apply to political contributions by certain family members of directors. The scope of family members covered depends on the jurisdiction and circumstances but generally covers spouses and dependent children. Directors should avoid and should attempt to ensure that their covered family members avoid, making political contributions that could restrict Leidos' business or violate these laws.
- **Procurement Integrity and Use of Competitive Information.** Directors should avoid knowingly obtaining bid or proposal-related information about a competitor. If a director obtains confidential information about a competitor, customer or supplier of Leidos, the director should not convey that information to Leidos. Directors should avoid discussions with Leidos' competitors that could restrain competition or otherwise violate antitrust laws, such as discussions involving non-public or sensitive information about Leidos' or a competitor's costs, profits, pricing, bids, markets and similar competitive information.
- **Anti-Bribery and Anti-Corruption.** Directors must comply with all applicable anti-bribery and anti-corruption laws, including the U.S. Foreign Corrupt

Practices Act ("FCPA"), the UK Bribery Act 2010, and other applicable international anti-corruption laws. Directors shall not, directly or indirectly, offer, promise, authorize, or give anything of value to any U.S. or foreign government official, political party, party official, or candidate for political office for the purpose of obtaining or retaining business or securing any improper advantage. Directors shall not authorize, approve, or knowingly participate in any transaction that is intended to facilitate a corrupt payment or that is not accurately reflected in the Company's books and records. Directors shall not offer or give a gift or gratuity to any customer or government official, or accept or solicit a gift from any supplier, where doing so could influence a government official or create a perception that favorable treatment is being sought, received, or given, except as permitted by law. Directors are directed to the Company's Anti-Corruption and FCPA Policy for additional guidance.

- **Compliance with U.S. Export and Sanctions Regulations.** In accordance with U.S. export regulations, directors are responsible for protecting export-controlled information received in their capacity as a director from unauthorized disclosure to foreign persons or entities.
- **Cybersecurity, data protection, and emerging technology compliance.** Directors should be aware of legal and regulatory requirements relating to cybersecurity, protection of confidential and personal data, and the responsible use of emerging technologies, including artificial intelligence, as applicable to the Company's operations.

Fair Dealing

In addition to complying with laws and regulations, directors should deal fairly with Leidos' customers, suppliers, competitors, and employees. Directors shall not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair practice.

Directors are expected to treat all persons with dignity and respect. Directors shall not engage in, condone, or tolerate discrimination, harassment, or retaliation against any individual on the basis of race, color, religion, sex, sexual orientation, gender identity, national origin, age, disability, veteran status, or any other legally protected characteristic. Directors are encouraged to consult the Company's broader policies on equal employment opportunity, anti-harassment, and non-discrimination for additional guidance.

Ethics, Culture, and Oversight Responsibility

The Board plays a key role in promoting a culture of integrity. Directors are expected to support a strong tone at the top, encourage a speak-up culture, and oversee the effectiveness of compliance and risk management programs.

Reporting Misconduct and Non-Retaliation

Directors should promptly inform the Chair of the Corporate Governance and Ethics Committee of any violations of this Code that come to their attention. Violations will be investigated and the Board will take appropriate action, to include remedial measures, changes in committee assignments or leadership roles, or a request for resignation, as appropriate

Leidos prohibits retaliation against any individual who raises a concern in good faith.

Waiver or Amendment of Code of Ethics

Any waiver or amendment of this Code shall be approved by the Board of Directors. Leidos will promptly post on its website any material changes to or waiver from this Code.

Annual Certification and Ongoing Education

Directors are expected to annually acknowledge compliance with this Code and participate in periodic briefings or training regarding relevant legal, regulatory, and risk topics.

Annual acknowledgment will be obtained through an annual written certification process administered by the Corporate Secretary or the Chief Compliance Officer and maintained as part of the Company's governance records.

No code or policy can anticipate every situation that may arise or replace thoughtful and ethical behavior. Directors are encouraged to bring questions about particular circumstances to the attention of the Chair of the Corporate Governance and Ethics Committee, the General Counsel, the Corporate Secretary or the Chief Compliance Officer.

Directors may consult with the Chair of the Corporate Governance and Ethics Committee, the General Counsel, the Corporate Secretary or the Chief Compliance Officer if they have any questions about this Code.

May 1, 2026