Code of Business Conduct and Public Sector Ethics Policy

D3 Global Holdings LLC (DBA D3 Command) | Adopted and effective 11/24/2026 | Owner: Seun Olawepo, President/Owner

1. Purpose and scope

This Code sets the ethical standards for all business of D3 Global Holdings LLC ("D3"), including sales to U.S. Federal, state and local government entities, public school districts and cooperatives. It applies to D3's owner and to any current or future employee, contractor, subcontractor, agent or representative acting for D3. Compliance is a condition of working with or for D3.

2. Compliance with laws

D3 complies with all applicable laws, including the U.S. Foreign Corrupt Practices Act, 18 U.S.C. §201 (bribery of public officials), the Anti-Kickback Act, the False Claims Act, the Procurement Integrity Act, Texas Penal Code Chapter 36 and state and local ethics and procurement laws, antitrust laws, and the Federal Acquisition Regulation and agency rules when they apply.

3. Anti-bribery and anti-corruption

- D3 never offers, promises, gives, requests or accepts any bribe, kickback, facilitation payment or improper advantage, directly or through a third party.
- **Gifts to Government Officials:** D3 does not give anything of value to any Government Official or public employee, including gifts, meals, travel, entertainment, donations or employment offers, except items expressly permitted by the applicable law and the agency's own rules. When in doubt, D3 gives nothing.
- D3 does not pay or compensate any Government Official, former official or their family members for any purpose, and does not use consultants or agents to influence a procurement.

4. Procurement integrity and honest dealing

- Bids, quotes, certifications, invoices and records are complete, accurate and truthful. D3 does not overstate experience, authorizations, certifications or capabilities.
- D3 does not seek or use non-public procurement or source-selection information, and follows each solicitation's no-contact (anti-lobbying) rules.
- D3 prices independently and never colludes with competitors on bids (no bid rigging, price fixing or market allocation).
- D3 discloses felony convictions, conflicts and other facts when a solicitation or law requires it, and files required forms such as Texas Form 1295 and Conflict of Interest Questionnaires.

5. Conflicts of interest

D3 avoids any business, financial or family relationship with a public official or customer employee that could create a conflict of interest, and discloses any potential conflict in writing to the customer before doing business.

6. Trade, export and sanctions compliance

D3 sells only within the United States and complies with U.S. export control and sanctions laws (EAR, OFAC). D3 does not deal with sanctioned or embargoed countries or restricted parties, and does not supply prohibited products such as covered telecommunications equipment (FAR 52.204-25), Kaspersky products (FAR 52.204-23) or FASCSA-prohibited articles (FAR 52.204-30).

7. Data protection and security

D3 protects customer and government information, uses multifactor authentication and secure systems, does not collect student data except as a contract requires, and reports security incidents to affected customers promptly.

8. Third parties

D3 works only with authorized distributors and manufacturers (such as TD SYNNEX and D&H Distributing) and reputable service providers. Before engaging a subcontractor, agent or representative for public sector work, D3 checks it against SAM.gov exclusions and sanctions lists and requires it to follow this Code.

9. Responsibility, reporting and enforcement

- The President/Owner serves as D3's Compliance Officer and is responsible for implementing, enforcing and annually reviewing this Code.
- Concerns or suspected violations must be reported to the Compliance Officer (seun@d3command.com) and, where required, to the customer or the appropriate agency (for Federal contracts, the agency Office of Inspector General under FAR 52.203-13). Retaliation against good-faith reporters is prohibited.
- Any employee, contractor or representative will receive this Code and confirm in writing that they will follow it. Violations result in corrective action up to termination of employment or the business relationship.

Adopted by:

Adopted by the President/Owner 11/24/2026

Seun Olawepo, President/Owner and Compliance Officer
D3 Global Holdings LLC (DBA D3 Command) Date