

RESEARCH ACTIVITY POLICY

D2 Team Corp | A Georgia Nonprofit Corporation | Adopted June 21, 2026

ARTICLE I — PURPOSE AND APPLICABILITY

1.01 Purpose.

D2 Team Corp (the “Corporation”) is a Georgia nonprofit corporation recognized as a public charity under Section 501(c)(3) of the Internal Revenue Code. This Research Activity Policy (the “Policy”) operationalizes the Corporation’s commitments under the Articles of Incorporation (as amended) and the Bylaws relating to the conduct, scope, and public dissemination of the Corporation’s research, education, and workforce-development activities. The Policy is intended to ensure that all such activities are carried on in the public interest within the meaning of Treasury Regulation § 1.501(c)(3)-1(d)(5).

1.02 Applicability.

This Policy applies to all research, educational, and workforce-development activities undertaken by, in the name of, or with the support of the Corporation, whether conducted directly, in collaboration with academic institutions or other organizations, or under a federal grant, federal subaward, or similar funded engagement.

1.03 Public Availability.

This Policy shall be published on the Corporation’s website at www.d2teamcorp.org and made available without charge to any interested party. Adoption, amendment, and current text shall be made publicly available in the same manner.

ARTICLE II — MISSION FOCUS

2.01 Permitted Subject Matter.

Research, education, and workforce-development activities of the Corporation shall be directly related to one or more of the following subject-matter areas:

- (a) Space systems, including spacecraft, payloads, launch and ground systems, satellite communications, and orbital operations;
- (b) Space cybersecurity, including threat modeling, detection engineering, incident response, and resilience for space and space-adjacent systems;
- (c) Cyber-physical systems supporting space missions, including ground-segment infrastructure, command-and-control systems, and supply-chain integrity for space hardware and software;
- (d) Artificial intelligence as applied to space systems and space cybersecurity, including machine learning, federated learning, and trust-conditioned reasoning in adversarial environments; and

- (e) Extended-reality technologies as applied to space domains, including training, simulation, mission visualization, and human-systems integration.

2.02 Mission-Boundary Constraint.

The Corporation **shall not** undertake research, education, or workforce-development activities that are not directly related to the subject-matter areas identified in Section 2.01. Any proposed activity that may fall outside these areas shall be treated as a Mission Interest under the Corporation's Conflict of Interest Policy and shall be reviewed under that Policy before being undertaken.

2.03 Preference for Space-Sector Engagement.

In selecting collaboration partners, subaward relationships, and contractual counterparties, the Corporation shall give preference to organizations whose missions are substantially focused on space systems, space cybersecurity, or the public-benefit dissemination of space, artificial intelligence, or extended-reality knowledge. Acceptable categories of preferred counterparty include accredited academic institutions, governmental space agencies, intergovernmental organizations, recognized standards-development organizations, nonprofit research institutes, federally-funded research and development centers, information-sharing-and-analysis centers, and other public-benefit space-sector entities.

ARTICLE III — PUBLIC-BENEFIT ARTIFACT REQUIREMENT

3.01 Requirement.

Every research project undertaken by the Corporation shall, as a condition of authorization, provide for the production of **at least one publicly available artifact that democratizes access to space, artificial intelligence, or extended-reality education**. The artifact shall be made available to the public on a nondiscriminatory basis and shall be identified and tracked as part of the Corporation's research-activity records.

3.02 Acceptable Artifact Forms.

The public-benefit artifact requirement may be satisfied by any one or more of the following forms, or by other forms approved by the Board:

- (a) A peer-reviewed journal article published in an open-access venue or otherwise made publicly accessible without charge;
- (b) A freely accessible public course, training module, workshop curriculum, or educational resource, hosted on the Corporation's website, on a third-party open-education platform, or otherwise made available to the public without charge;
- (c) An open-source software release published under a recognized open-source license (such as the MIT License, the Apache License 2.0, or the BSD License), with source code and documentation made publicly available in a recognized public code repository;
- (d) An open dataset, benchmark, or evaluation harness published under a recognized open-data license and made publicly available;

- (e) Technical documentation, white papers, or standards-aligned contributions made publicly available through the Corporation’s website, a standards-development organization, or other recognized public channel; or
- (f) Other educational or technical artifacts that, in the determination of the Board, materially advance public access to knowledge in the subject-matter areas of Section 2.01.

3.03 *Dissemination.*

The Corporation shall maintain a public-facing record of public-benefit artifacts produced under this Policy on its website. The record shall identify the artifact, the associated research project, the public access location (URL or other identifier), and the date of public release.

ARTICLE IV — PUBLIC-INTEREST RESEARCH COMPLIANCE

4.01 *Research in the Public Interest.*

Consistent with Treasury Regulation § 1.501(c)(3)-1(d)(5), research conducted by the Corporation shall be carried on in the public interest. The Corporation considers research to be carried on in the public interest where:

- (a) The results of the research, including any patents, copyrights, processes, software, and data resulting from the research, are made available to the public on a nondiscriminatory basis (through the public-benefit artifact requirement of Article III or otherwise);
- (b) The research is performed for the United States, any of its agencies or instrumentalities, or for a state or political subdivision; or
- (c) The research is directed toward benefiting the public, including by addressing challenges in space-systems cybersecurity, public safety, critical-infrastructure resilience, or workforce development.

4.02 *No Proprietary or Commercial-Only Research.*

The Corporation shall not undertake research that is conducted primarily for the commercial benefit of a single private party or that is structured to withhold results from the public. Sponsored or collaborative research undertaken under federal grants or subawards, or undertaken with academic or governmental partners and disseminated publicly, satisfies this provision.

ARTICLE V — STANDARDS ALIGNMENT

5.01 *Standards-Development Engagement.*

Where consistent with the Corporation’s mission focus and the public-benefit artifact requirement, the Corporation shall align its research activities with active and emerging standards work in space-systems cybersecurity, including work undertaken by the Institute of Electrical and Electronics Engineers (IEEE), recognized space-sector information-sharing organizations, and other competent standards-development bodies. Standards-aligned contributions, technical comments, and reference implementations may satisfy the public-benefit artifact requirement of Article III where they are made publicly available.

ARTICLE VI — INTELLECTUAL PROPERTY

6.01 *Default to Public Release.*

Intellectual property created in the course of the Corporation's research activities shall, by default, be made available to the public under open-source, open-access, or open-data terms suitable to the form of the work. Departures from this default require Board approval, shall be documented, and shall not be made where the departure would result in inurement to any private person or in substantial private benefit to any for-profit entity inconsistent with Section 501(c)(3) of the Internal Revenue Code.

6.02 *Federally Funded Inventions.*

Where intellectual property is developed in whole or in part with federal funds, the Corporation shall comply with the Bayh-Dole Act (35 U.S.C. §§ 200–212) and the regulations promulgated thereunder, including required invention disclosures, election to retain title, government license grants, and good-faith efforts to commercialize through nonexclusive or limited-exclusive licensing where commercialization is appropriate.

6.03 *Attribution.*

Public-benefit artifacts produced under this Policy shall include appropriate attribution to the Corporation as the responsible nonprofit entity, to the authors and contributors, to any collaborating institutions, and to any federal grantor agency or prime awardee whose support contributed to the work.

ARTICLE VII — HUMAN SUBJECTS RESEARCH

7.01 *Institutional Review Board.*

Where any research activity of the Corporation involves human subjects within the meaning of 45 C.F.R. Part 46 (the Common Rule), the Corporation shall ensure that the research is reviewed and approved by an appropriate Institutional Review Board (IRB), either through a collaborating academic institution's IRB or through engagement of a recognized independent IRB. No human-subjects research shall be undertaken without prior IRB review and approval.

ARTICLE VIII — AUTHORSHIP AND COLLABORATION

8.01 *Authorship Criteria.*

Authorship of Corporation-produced research outputs shall be determined in accordance with recognized authorship criteria (such as those of the International Committee of Medical Journal Editors or the Committee on Publication Ethics, as applicable). The Corporation does not engage in ghost authorship, gift authorship, or other authorship practices that misrepresent the contributions of any party.

8.02 *Collaboration Disclosure.*

All collaborating institutions, prime awardees, federal grantor agencies, and material in-kind supporters (including providers of in-kind cloud-computing credits, computing resources, or testbed access) shall be disclosed in the relevant research output, consistent with the disclosure requirements of any applicable funder or publisher.

ARTICLE IX — REVIEW AND AMENDMENT

9.01 *Annual Review.*

This Policy shall be reviewed by the Board not less than annually, in conjunction with the annual review required by the Corporation's other governance policies.

9.02 *Amendment.*

This Policy may be amended by action of the Board in accordance with the Corporation's Bylaws. Amendments shall be published on the Corporation's website at www.d2teamcorp.org as part of the publicly available current text of the Policy.

ADOPTION CERTIFICATION

Research Activity Policy — D2 Team Corp

The undersigned, being the sole Director and the Chief Executive Officer of D2 Team Corp, a Georgia nonprofit corporation, hereby certifies that the foregoing Research Activity Policy was duly adopted by written consent of the sole Director on the date set forth below, and constitutes the Research Activity Policy of the Corporation as in effect on such date. The undersigned further certifies that the Corporation's research, education, and workforce-development activities are conducted in alignment with the standing of the undersigned as Senior Member of the Institute of Electrical and Electronics Engineers, as Technical Editor of the IEEE Space Systems Cybersecurity Working Group, and as Subgroup Lead of the IEEE Space Systems Integration Layer Subgroup, and in furtherance of sustained engagement with the United States Space Information Sharing and Analysis Center.

Date: June 21, 2026

William Ferguson

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Sole Director and Chief Executive Officer

D2 Team Corp