

CORPORATE POLICY MANAGEMENT

Policy Number: CPM-02

OWNER: CEO

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Narda-MITEQ

Code of Conduct


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Code of Conduct

Narda Acquisition Co, Inc. and Affiliates (including Company, Intelligent RF Solutions (iRF), Narda Safety Test Solutions, GmbH (Germany), and Narda Safety Test Solutions S. r. L. (Italy)

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From the Desk of: Bob Tavares, Chief Executive Officer

Fellow Employees

Our shared success as members of the Narda Acquisition Co, Inc. and Affiliates (“the Company”) community relies heavily on our continuing commitment to our customers, our innovative product solutions, the quality of our engagement with customers and each other, and the development of our employees. Enabling and supporting all these is our strong focus on integrity at the heart of the Company’s Code of Conduct. Behaving ethically and with integrity is what we expect from all of our leaders and every one of our team members. Acting according to our Code of Conduct must be a daily priority, because only through this unwavering emphasis will we continue to build our company. There can be no excuses for acting otherwise.

The Company Code of Conduct covers a variety of topics to help team members make good decisions. If, however, you have questions about a situation, or are not sure what steps to take, Human Resources or other resources identified in the Code of Conduct can help. What is most important is that you fully review and understand our Code of Conduct so that it can guide your behavior.


If you have any concerns at any time about possible ethical violations within the Company, please speak up. All communication will be kept confidential and there will be no retaliation for coming forward.

The Company’s Code of Conduct represents our shared promise to uphold the highest standards of business practice. Please join me in making that a daily commitment and a hallmark of our Company’s culture.

Sincerely,



Bob Tavares
 Chief Executive Officer
 Narda Acquisition Co, Inc.

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1.0 INTRODUCTION

Narda Acquisition Co (the “Company”) is committed to conducting its business in compliance with applicable laws, rules, and regulations and in accordance with the highest ethical standards of business conduct. All of the Company’s employees are expected to conduct their activities and the operations for which they are responsible in accordance with such standards.

The Company Code of Conduct summarizes essential policies, laws, and regulations that we need to know while employed at the Company and is our guide to ethical decision-making. Making ethical decisions is essential to how we work with each other, with our customers and business partners, and within our global community. Following the Code of Conduct is mandatory.

This Code of Conduct applies to all of our employees, directors, officers, and agents, wherever they are located and whether they work for the Company on a part-time or full-time basis. Violations are taken seriously at the Company and may result in disciplinary action, up to and including termination of employment.

No code or policy can anticipate every situation that may arise. Company employees are encouraged to bring questions about particular circumstances that may implicate one or more of the provisions of this Code of Conduct to the attention of their supervisor or Human Resources or Executive Management who may consult with legal counsel as appropriate.

In the event an employee is uncomfortable reporting an incident to the above-named individuals, the employee may submit concerns through the confidential compliance line:

www.hotline-services.com


1-855-252-7606

2.0 NARDA-MITEQ CORE VALUES

Our company is engaged in important work delivering solutions that affect the security and safety of our customers’ customers around the world. They depend on us to deliver what we promise. To do that, and to do it consistently, requires a company culture that expects the best from each of us. Every employee at Narda-MITEQ is a participant in an environment that has integrity as its foundation, respect as its operational principle and innovation as its constant aspiration. Just as important, our Narda-MITEQ community is governed by an unwavering commitment to safety within our work environments and accountability for all our words and actions.

Within this company culture, all our Narda-MITEQ colleagues have the freedom and responsibility to achieve and grow professionally, as well as bring excellence to our products and solutions sets, efficiency to our operational performance and financial strength to our company.

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Our Narda-MITEQ community is specifically defined by our **shared core values**. They are:

- **Safety** – No compromises when it comes to safety. Every decision and work activity is done safely without exception. Every incident is preventable, and all employees are responsible for their safety and the safety of others.
- **Integrity & Ethics** – Demonstrating commitment to ensuring ethical and impartial business practices. All employees behave ethically and do the right thing in an honest, fair, and responsible way.
- **Trust & Respect** – Trust is a belief in employees and respect is that trust in action. A culture of respect enables people to contribute knowing that they would be heard, and to share their ideas without fear. Treating people right because they truly matter fosters a healthy and trusting organizational culture.
- **Accountability** – Setting and holding people to a common expectation. Accomplish the things said would be done. Each of us is responsible for our words, our actions, and our results.
- **Innovation** – Development of new ideas or improvement of existing ideas. Enable employees to use and develop their skills, knowledge, experience, and creativity to fullest potential.


3.0 MAKING ETHICAL DECISIONS

Our Code of Conduct cannot anticipate every scenario in which we might encounter an ethical dilemma, decision, or question. We should always use our best judgement. When faced with an ethical dilemma, use the process outlined below to guide the decision-making process.

1. Define the Problem | Situation | Issue
2. Seek out Guidance and Support
3. Identify Options and Alternatives
4. Make the Best Decision
5. Implement the Decision
6. Evaluate the Decision

4.0 CONFLICTS OF INTEREST

We are trusted to always act in the best interest of the Company, devote our full professional effort to our jobs and to avoid conflicts of interest. A conflict of interest occurs when an employee’s personal interests interfere, or appear to interfere, with the interests of the Company as a whole. It is important for all employees to avoid not only conflicts of interest, but also the appearance of a conflict of interest.

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If a potential conflict of interest either exists currently or arises in the future, details should be reported promptly so that the facts may be properly evaluated and a decision made as to what, if any, action should be taken in connection with the matter. Should there be a question as to whether a conflict exists, any doubt should be resolved in favor of assuming that there is a potential conflict, and the circumstances must then be reported in writing to a member of Executive Management which consists of the CEO, CFO, and Human Resources or through the Company Hotline.


Conflicts of interest may include concurrent employment with, or acting as a consultant or contractor to, any Company competitor, customer or supplier; service on the board of directors or technical advisory board of another entity; or holding a significant financial interest in any competitor, customer or supplier of the Company.

Conflicts of interest commonly arise in the following situations:

- When an employee or a family member has a significant direct or indirect financial interest in, or obligation to, an actual or potential competitor, supplier or customer of the Company;
- When an employee has a significant personal relationship (such as a family relationship) with a competitor, supplier or customer of the Company;
- When an employee conducts business on behalf of the Company with a supplier or customer when a family member is an employee, principal, officer or representative of such supplier or customer;
- When an employee, family member or agent of an employee accepts gifts of more than a nominal value or excessive entertainment from a current or potential competitor, supplier or customer; and
- When an employee misuses the information obtained in the course of their employment.

It is recognized that directors of the Company and any of its subsidiaries who are not employees may engage in outside activities with, or have duties to, other entities, as employees, directors, consultants or otherwise. Such activities and duties generally do not in and of themselves constitute a conflict of interest, and in fact are valuable to the Company because of the experience and perspective that outside directors offer to the Company as a result of these activities.

Organizational Conflicts of Interest (OCI) may occur in connection with government contracts when activities being performed by the contractor can either result in an unfair competitive advantage for the contractor or the work may impair the contractor’s ability to be objective. The Federal Acquisition Regulation (FAR) defines an OCI as a situation where “because of other activities or relationships with other persons, a person is unable or potentially unable to render impartial assistance or advice to the Government, or the person’s objectivity in performing the contract work is or might be otherwise impaired, or a person has an unfair competitive advantage.” OCIs are becoming more and more common as the U.S. government moves towards

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the contracting of services that were traditionally done by U.S. government employees and as the defense industry merges and consolidates. It is the responsibility of contractors to avoid, neutralize, or mitigate OCIs to prevent an unfair competitive advantage.

5.0 COMPLIANCE WITH CORPORATE POLICIES AND APPLICABLE LAWS AND REGULATIONS

We are expected to comply with both the spirit and letter of all of the Company’s corporate policies and all applicable governmental laws, rules and regulations.


6.0 ANTI-CORRUPTION POLICY

It is the policy of the Company that all of its subsidiaries and affiliates, all employees, officers, directors of the Company or of any of its subsidiaries or affiliates, its agents, representatives, consultants, and all people or entities that act as a representative or advisor to the Company or any of its subsidiaries or affiliates shall fully comply with all applicable provisions of the U.S. Foreign Corrupt Practices Act (“FCPA”) and related laws of other countries in which The Company does or intends to do business (such as the UK Bribery Act and Canadian Corruption of Foreign Public Officials Act). We are prohibited from offering, giving, soliciting or accepting any bribe or kickback, whether dealing with government officials, political parties or representatives of commercial organizations.

This means that we:

- Conduct due diligence when hiring or managing third parties since they are acting on our behalf;
- Accurately record all payments and transactions;
- Never give, offer, accept or promise anything of value that may be construed as illegal or improper;
- Prohibit facilitation payments unless someone’s safety or welfare is at stake or with advance approval from the Company’s Executive Management;
- Prohibit offering or giving anything of value to a government official for the purpose of improperly influencing decision-making;
- Do not engage in financial transactions that, directly or indirectly, promote or result from criminal activity, including false invoices, unauthorized payments to offshore banking locations or unauthorized payments to third parties outside the territory in which the third party operates; and/or
- Do not become involved in financing, supporting, or assisting any terrorist person, activity, or organization.

Department of Defense Implementation of the Disclosure Requirement Under FAR Clause 52.203-13

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- FAR 52.203-13 states: "The Contractor shall timely disclose, in writing, to the agency Office of the Inspector General (OIG), with a copy to the contracting officer, certain violations of criminal law, violations of the civil False Claims Act." On December 29, 2008, the Under Secretary of Defense for Acquisition, Technology, and Logistics (USD(AT&L)) designated the DoD OIG as the "agency Office of the Inspector General" for purposes of receiving disclosures from DoD contractors. (USD(AT&L) memorandum. The Defense Acquisition Regulation Supplement Part 203.1003 was amended to instruct contractors to send disclosures to the DoD OIG.

The Company's Anti-Corruption Policy is distributed annually.

"Bribe" – Not limited to cash payments, but anything of value, including gifts, entertainment, hospitality, travel or other favored offered, given solicited or received for an improper use.


"Kickback" – Providing or receiving something of value either to obtain or reward favorable treatment on a government contract or subcontract.

"Facilitation payment" or "grease payment" – Payment of cash or the provision of a small gift to a low-level government official to speed or initiate the performance of expected government service to which COMPANY is entitled. Facilitation payments do not include payment of established fees for government services.

7.0 PROCUREMENT INTEGRITY / ANTI-COMPETITIVE BEHAVIOR POLICY

The Procurement Integrity Act (PIA) provides a series of prohibitions designed to protect the integrity of the procurement process and enable fair competition among entities that compete for government contracts. The Company values the integrity of the procurement process in bidding, negotiating, and performing contracts. This is done by safeguarding access to competitive information and imposing post-employment restrictions on certain current and former government employees. Specifically, during a competition, the PIA prohibits government officials from disclosing to the Company, without written authorization, any other contractor's bid or proposal information or the government's internal source selection information. As Company employees, it likewise prohibits us from improperly seeking or obtaining those types of information. We strive to be fair in our dealings with customers, suppliers, competitors and our employees. We communicate clearly and truthfully in all statements and submissions to potential customers and suppliers. Contractual requirements – including all terms and conditions, specifications and requirements – drive our performance. Our compliance with these contractual requirements forms the foundation for our performance and growth.

The Company is committed to competing fairly, with integrity, and conducting our business in compliance with all applicable competition and anti-trust laws. Most of the countries in which the Company does business have laws designed to promote free and open competition and to prohibit activities designed to restrain trade.

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We will not:

- Communicate with competitors to discuss prices, allocate markets, boycott customers or suppliers, or limit production of services for anti-competitive purposes;
- Make false statements about our competitors;
- Obtain or use any information from a customer, competitor or other source to which THE COMPANY is not clearly and legitimately entitled;
- Obtain or use information, such as proposal prices, competitor pricing or technical data, proposal evaluations, internal government estimates, or any information marked by the U.S; government or other government entity as “source selection information” or similar markings; and/or
- Obtain or use proprietary information in any form possessed by new hires from their prior employers.

Anti-Competitive Behavior Policy. Competition laws (also known as “antitrust laws,” “antimonopoly,” or “fair trade practices laws”) apply wherever the Company does business in the world. The laws may differ in some respects, but they generally address similar kinds of conduct and share common underlying values. The purpose of competition laws is to protect and foster the efficient operation of a free market by assuring competition among companies at all levels of trade.

Competition laws prohibit any conduct that damages competition, such as agreements between competitors, that may restrict innovation and technical development or may lead to higher prices or lower quality or output on the market. The term “agreement” in this context has a broad meaning and includes formal as well as informal agreements, written and oral agreements. The term applies equally to agreements entered into between competitors (sometimes known as “horizontal agreements”) and agreements entered into between the Company and its suppliers, customers, distributors or other companies operating at different levels of the production or distribution chain (sometimes known as “vertical agreements”). Examples of illegal agreements include schemes among competitors to fix prices, divide territories, allocate customers, jointly boycott customers or suppliers, limit production or engage in bid rigging.

Company employees are encouraged to report suspected anti-competitive behavior promptly as it is the Company’s policy to comply with all competition laws. Failure to comply with these laws may result in contractual risk, substantial fines, penalties, civil liability and criminal penalties.

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8.0 GIFTS AND GRATUITIES

The Company’s business transactions should always be free from even a perception that favorable treatment was sought, received or offered through gifts, favors, hospitality, entertainment or similar gratuities. This is particularly important when dealing with government employees. Business courtesies include tickets, fees or passes to sporting or cultural events, lodging, travel, meals, door prizes and other items of value.

Appropriate business gifts and entertainment are courtesies designed to build relationships and understanding among business partners. When providing or accepting business meals, entertainment or nominal gifts our conduct must be both ethical and lawful as set forth in the Anti-Corruption section of this policy.

While individual circumstances differ, overriding principles concerning gratuities is not to give or accept anything of value that could be perceived as creating an obligation on the part of the recipient to act other than in the best interests of their employer or otherwise taint the objectivity of the individual’s involvement. All permitted gifts and entertainment expenses must be properly accounted for on expense reports.


With few exceptions, U.S. government agencies have strict prohibition against their employees accepting any business courtesies. Therefore, except as otherwise permitted by regulation or prior Executive Management approval, The Company is prohibited from offering or providing any business courtesy to a U.S. government employee or representative. Modest refreshments, such as soft drinks, tea, coffee, fruit, offered on an occasional basis in conjunction with business activities, may be acceptable.

Employees and officials of non-U.S. governments are subject to local regulations and their specific agency’s rules. The Company must abide by these regulations when doing business with non-U.S. governments. The Company expects all third-party intermediaries or business partners that represent the Company interests outside the U.S. to comply with these rules.

It is the Company’s responsibility to inquire about any prohibitions or limitations applicable to the recipient’s organization before offering any business courtesy. We may provide meals, refreshments or entertainment of reasonable value to non-government persons in support of business activities, provided:

- Courtesy is not offered to obtain favorable treatment;
- Courtesy does not violate any law, regulation or the standard of conduct of the recipient’s organization; and/or
- Courtesy is consistent with marketplace practices, infrequent in nature, and is not lavish or extravagant.

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When receiving business courtesies, the Company may or must:

- Not solicit, directly or indirectly, business courtesies which benefit us or our family members;
- Not accept business courtesies with an agreement to do anything in return, particularly when involved in contract solicitation or negotiations;
- Only accept business courtesies consistent with reasonable marketing customs;
- Never accept cash or cash equivalents, such as gift cards; and/or
- Decline or return inappropriate business courtesies, or if they cannot be returned, turn them over to Executive Management.

9.0 PARTICIPATING IN POLITICAL ACTIVITIES

The Company respects personal participation in the political process by our employees. Any involvement and/or participation in the political process must be conducted on an individual basis, on the employee's own time and at their own expense.


10.0 USE OF THE COMPANY'S RESOURCES / COMPUTER USAGE

The Company resources, including time, materials, equipment and information, are provided for the Company use. Employees are trusted to use good judgement to conserve the Company resources. Personal use of the Company resources is inappropriate. In no event may an employee use the Company funds or assets for an unlawful purpose. The Company information systems are critical to our day-to-day business activities and every person must use them responsibly. Remember to:

- Never share passwords;
- Secure computers, removable media and mobile phones;
- Avoid inappropriate use of internet sites;
- Never install unapproved hardware or software;
- Immediately report the loss or improper use of, or access to, the Company information systems, including mobile devices, phones, laptops, keycards, user IDs and passwords.

The Company's computer resources, which include the electronic mail system and instant messaging, are not intended to be used for amusement, solicitation or other non-business purposes. E-mail and text messages should be treated as any other written business communication. The Company may monitor employees' electronic communications and other computer use.

The Company assets are to be used solely for the business purposes of the Company. An employee must not use the Company's corporate name, any trademark owned or associated with

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the Company, any Company letterhead, or any Company property, confidential information, resources, supplies or assets for personal purposes.

11.0 MAINTAINING A SAFE AND HEALTHY WORK ENVIRONMENT

The Company is committed to maintain a safe and healthy drug-free work environment. Be sure to comply with all applicable health, safety, and security laws, policies, procedures, internal controls and regulations. We train Company employees to operate safely. As part of our environmental initiatives, we seek to protect the environment, conserve natural resources and prevent pollution whenever possible.


Adhere to the following:

- Follow all safety procedures, protocols, and training;
- Understand the hazards and safety control measures at all times;
- Stop work if the employee feels a job cannot be performed safely;
- Report any work-related or on work premises injury, illness, near miss, or other safety incidents immediately; and/or
- Escalate any questions or concerns to a supervisor, Human Resources, or member of Executive Management.

11.1 Substance Use/Abuse

The unauthorized use of controlled substances or alcohol can create serious safety risks. We will not knowingly hire or employ individuals who possess, use, sell, manufacture or traffic in drugs or alcohol. The Company complies with the Drug Free Workplace Act of 1988 and all federal, state, and local laws concerning violations of criminal drug statutes in the workplace. The possession, sale or use of unauthorized substances, or being under the influence of such unauthorized controlled substances, on the Company time, property, or at a Company-sponsored event is prohibited. Every Company employee is held accountable for ensuring that their performance and judgement are unimpaired during working hours. The Company offers resources to employees who are suffering from drug or alcohol dependency.

If a supervisor has reasonable suspicion to believe that an employee's use of drugs or alcohol may adversely affect the employee's job performance or the safe of the employee or others in the workplace, the supervisor may request an alcohol or drug screening. A reasonable suspicion may be based on objective symptoms such as the employee's appearance, behavior, speech, or activities.

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11.2 Workplace Violence

As part of the Company commitment to safety, the workplace must be free from threats of or physical violence. All weapons are prohibited in the workplace.

The Company actively mitigates threats to employee safety and may add, amend, or evolve practices and protocols as necessary (e.g., during a pandemic). We also comply with all customer and national security policy requirements to protect proprietary information and classified material entrusted to the Company. Compliance with these requirements is required by contract and enables the Company products and services to be delivered securely.

12.0 GOOD CORPORATE CITIZENSHIP


The Company is committed to sustainability and responsible corporate citizens. Respect for human rights is integral to good corporate citizenship, and in a variety of contexts including, but not limited to the following:

- Treat all colleagues with respect;
- Diversity, Equity, and Inclusion is THE COMPANY foundation;
- Offer fair and competitive compensation; and/or
- Zero tolerance for any forms of harassment and/or discrimination.

13.0 DIVERSITY, EQUITY, AND INCLUSION

Every individual in the Company brings a unique background and perspective, as well as distinctive set of abilities. Leveraging our diversity creates innovative solutions and enhances our delivery of world class customer service. Our diverse employee population, business partners and local communities are critical to serving our diverse set of global customers. All people are welcomed and respected with opportunities for personal and professional development. Our commitment to inclusion drives productivity, creativity, and growth.

The Company is committed to treating all people for employment with respect and dignity while maintaining a workplace that is free from unlawful discrimination. Employment with the Company is based solely upon individual merit and qualifications directly related to professional competence. The Company's policy on equal employment opportunity prohibits discrimination or harassment on the basis of race, color, religion, national origin, ancestry, gender, sexual orientation, gender identity, expression of pregnancy status, marital status, age, physical or mental disability, medical condition, genetic factors, military or veteran status, or any other characteristics protected by law. The Company also provides reasonable accommodations to qualified individuals as required by law. The Company seeks to provide a work environment where everyone can perform effectively and achieve their full potential.

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14.0 AVOIDING HARASSMENT, DISCRIMINATION, AND BULLYING

The Company will not tolerate harassment, discrimination, or bullying of any type, including physical emotional, verbal, visual, or sexual. This policy extends to colleagues, suppliers, customers and anyone else who does business with the Company. If you believe you have been bullied, harassed, or discriminated against by a colleague, supplier, customer, or anyone else, we strongly encourage you to immediately report the incident to your supervisor, Human Resources, or a member of Executive Management. Similarly, supervisors who learn of any such incident should immediately report it to Human Resources who will promptly and thoroughly investigate any complaints and take appropriate action.

15.0 PROHIBITING TRAFFICKING-RELATED ACTIVITIES

The Company is committed to protecting all human rights and preventing human trafficking by promoting and complying with all human rights laws and standards in all Company locations. The Company is committed to ensuring that its employees and suppliers take appropriate steps to mitigate the risk of human trafficking and slavery from occurring in any aspect of The Company’s business or supply chain.


The California Transparency in Supply Chains Act of 2010 requires retailers and manufacturers doing business in California to disclose efforts to eradicate slavery and human trafficking from its direct supply chain.

The United Kingdom Modern Slavery Act 2015 requires commercial organizations to disclose their policies and other information in relation to slavery and human trafficking, and the steps the organizations have taken during the preceding financial year to ensure that slavery and human trafficking are not taking place within the business and its supply chains.

The United States Government has addressed combating trafficking persons through Federal Acquisition Regulation (FAR) 52.222.50, which states in part the following:


The U.S. government has adopted a policy prohibiting trafficking in persons, including the trafficking related activities of this clause. Contractors, Contract-employees, and their agents shall not –

- 1) Engage in severe forms of trafficking in persons during the period of performance of the contract;
- 2) Procure commercial sex acts during the period of performance of the contract;
- 3) Use forced labor in the performance of the contract;

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- 4) Destroy, conceal, confiscate, or otherwise deny access by an employee to the employee's identity or immigration documents, such as passports or drivers' licenses, regardless of issuing authority;
- 5) Use misleading or fraudulent practices during the recruiting of employees or offering of employment, such as failing to disclose, in a format and language accessible to the worker, basic information or making material misrepresentations during the recruitment of employees regarding the key terms and conditions of employment, including wages and fringe benefits, the location of work, the living conditions, housing and associated costs (if employer or agent provided or arranged), any significant cost to be charged to the employee, and, if applicable, the hazardous nature of the work, or;
- 6) Charge the employee's recruitment fees;
- 7) Fail to provide return transportation or pay for the cost of return transportation upon the end of employment in specified circumstances;
- 8) Provide or arrange housing that fails to meet the host country and safety standards; or
- 9) If required by law or contract, fail to provide an employment contract, recruitment agreement, or other required work document in writing. Such written work documents shall be in a language the employee understands. If the employee must relocate to perform the work, the work document shall be provided to the employee at least five (5) days prior to the employee relocating. The employee's work document shall include, but is not limited to, details about work description, wages, prohibition on charging recruitment fees, work location(s), living accommodations and associated costs, time off, roundtrip transportation arrangement, grievance process, and the content of applicable laws and regulations that prohibit trafficking in persons.

All Company employees must comply with FAR 52.222.50 as required by contract.

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16.0 PRODUCING QUALITY PRODUCTS

The Company strives to deliver quality products and services that meet our customers' requirements, which are critical to building long-term customer-Company relationships. Quality is everyone's responsibility, so to ensure we meet the Company quality commitments and standards, we will:

- Pledge to perform each job right the first time;
- Prepare all required reports accurately;
- Comply with all contract and design specifications, including inspections and test procedures;
- Only use materials and processes conforming to the specifications in each contract;
- Ensure everyone is properly trained to perform the work;
- Report and address process or product issues in a timely manner;
- Ensure THE COMPANY quality reflects the highest standards; and
- Promise to continuously improve.

17.0 GLOBAL DATA PRIVACY & CONFIDENTIAL INFORMATION

The Company is committed to protecting the respective privacy of its employees, business partners, and customers. The Company is committed to collecting and using data only when necessary and only in a lawful, legitimate, and ethical manner.

Only employees who are authorized and have a work-related reason may access personally identifiable information such as the Company employee and medical records. These records will only contain information necessary for employment related purposes.


In accordance with the Company policies and data privacy laws, the Company must protect and properly handle information in written, electronic or any other form, whether obtained from or relating to the Company or from any third parties, including suppliers and customers.

The Company is responsible for understanding the sensitivity of the information entrusted to the Company's care. On many occasions, the governments the Company works with give us access to classified information that requires special handling and a continuing obligation to protect it at all times.

Every Company employee is personally responsible for protecting the Company assets, and those provided to us by our customers, against unauthorized access, fraud, theft, loss, or abuse.

Immediately report any suspicions, fraud, theft, loss, or misuse of the global data privacy section of this policy.

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The Company must maintain accurate, current, and complete business and financial records in compliance with U.S. and international laws and regulations.

Employees may from time to time have access to confidential or proprietary information (which includes any non-public information, whether of a business, financial, personnel, technological, or commercial nature) of the Company or third parties, such as customers and suppliers of the Company, that an employee has learned, generated or acquired.

The Company employees are prohibited from using any information for personal advantage or in other ways and are responsible for protecting the data. Each employee has a fiduciary and legal obligation to the Company and such third parties to treat such information in confidence and not to disclose it to any other party or use it, directly or indirectly, for one's own purpose, whether during or after employment with the Company.


18.0 COMMUNICATING HONESTLY

The Company is committed to accurate, honest, and timely communications to employees, the media, government agencies and officials. Truthful and accurate communications is essential to meeting the Company responsibilities. Responsible use of social media is essential to safeguarding the Company's confidential and proprietary information and reputation. Only those employees authorized may speak on behalf of the Company.

19.0 CORPORATE OPPORTUNITIES

Employees owe a duty to the Company to advance its legitimate interests when the opportunity to do so arises. When an opportunity that relates to the Company's business has been presented to a Company employee, the employee is prohibited from:

- Personally taking opportunities for themselves that are discovered through the use of corporate property, information or the employee's position with the Company;
- Using Company property, information or position for personal gain; or
- Personally competing with the Company, directly or indirectly, for business opportunities.

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20.0 PROCEDURE FOR REPORTING VIOLATIONS

If anyone suspects activity or conduct to be in violation of this code or any applicable corporate policies, government laws, rules or regulations, the individual must immediately report the circumstances to a supervisor, Human Resources, or Executive Management.

In the event the individual is uncomfortable reporting the incident to the above-mentioned people, the employee may submit concerns through the confidential compliance line: www.hotline-services.com or by calling 1-855-252-7606.

21.0 INDIVIDUAL RESPONSIBILITIES

Every person has a responsibility to act with integrity and respect. Employees will:


- Be accountable for their conduct;
- Comply with the policies, laws, and regulations that apply to their jobs;
- Seek guidance, raise concerns and report any observed or suspected misconduct;
- Cooperate with investigations;
- Model ethical behavior and culture at all times; and
- Complete all required training on-time.

22.0 CONFIDENTIALITY AND POLICY AGAINST RETALIATION

All questions and reports of known or suspected violations of the law or this code will be treated with sensitivity and discretion. The Company will take appropriate action whenever violations have occurred. Company employees are expected to cooperate with internal investigations and interviews; always tell the truth and never provide false statements. Reports of unethical or illegal conduct will be promptly investigated. The Company strictly prohibits retaliation against an employee who, in good faith, seeks help or reports known or suspected violations.

Employees may also contact the Office of the Inspector General to report tips and complaints about potential fraud, waste, abuse, and mismanagement in OPM programs and operations by contacting the following:

Hotline Number – 877.499.7295 or <https://oig.opm.gov>

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23.0 ACKNOWLEDGEMENT

I hereby acknowledge that I have received a copy of the Company Code of Conduct. I further acknowledge that it is my responsibility to read and understand the Code of Conduct because it describes important information about The Company and my obligations as an employee.

I understand that as an employee of the Company, I am expected to abide by all the policies contained in the Code of Conduct and that any failure to do so can result in disciplinary action, up to and including termination. I further understand that The Company reserves the right to change, modify or delete any of its policies at any time. Any changes will be communicated through official notices, and I understand that revised information may supersede, modify or eliminate existing policies.

Employee Signature

Date

Print Name

CHANGE LOG

Revision	Date	Details
A	June 21, 2023	INITIAL RELEASE
B	July 16, 2024	INCORPORATED PER ECN 56227