



Code of Conduct
April 2022

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MESSAGE FROM THE CEO

Every day, everyone at Flexsys, Holdings, Inc. (and along with its subsidiaries “Flexsys” or the “Company”) has the power to influence our company’s reputation, everywhere we do business. The success of our business is dependent on the trust and confidence we earn from our employees, customers, suppliers, and vendors. We gain credibility by adhering to our commitments, displaying honesty and integrity, and reaching Company goals solely through honorable conduct. It is vital that we act ethically and with integrity, not only to maintain our reputation and comply with laws and regulations, but also because it is simply the right thing to do.

Maintaining our reputation is up to each and every one of us. At times, we are all faced with decisions we would rather not have to make and issues we would prefer to avoid. Sometimes, we hope that if we avoid confronting a problem, it will simply go away.

At Flexsys, we must have the courage to tackle the tough decisions and make difficult choices, secure in the knowledge that our Company is committed to doing the right thing. At times this will mean doing more than simply what the law requires. Merely because we can pursue a course of action does not mean we should do so.

To help you be successful in this endeavor, we have created this Code of Business Conduct (the “Code”). Although these guiding principles cannot address every issue or provide answers to every dilemma, they can define the spirit in which we intend to do business and should guide us in our daily conduct. To the extent this Code requires a higher standard than required by commercial practice or applicable laws, rules or regulations, the Company adheres to these higher standards. We want you to feel empowered to do the right thing in all circumstances, even when no one is watching.

I expect that you will review and become familiar with the elements of the Code of Conduct so that you will be equipped with the information to help you make fair and honest decisions. If you are ever in doubt or need to raise concerns about possible violations of law or company policy, please contact your manager, human resources, or our legal team. Speaking up is imperative to our success and addressing issues that can affect us all.

Join me in our shared commitment to upholding our high ethical standards together.



Sandip Tyagi
Chief Executive Officer

INTRODUCTION

Importance of a Code of Conduct

At Flexsys, we take pride in doing business following the principles of honest and ethical conduct of all employees. We believe that it takes more than strong business results to build a great company. Our reputation for integrity and excellence requires careful observance of the spirit and letter of all applicable laws and regulations, as well as conscientious regard for the highest standards of ethical conduct. Our continued success depends upon the trust of our customers, suppliers, shareholders, our fellow team members here at Flexsys, and the communities where we live and work. We are dedicated to preserving that trust.

The people of Flexsys have created a culture where integrity is of the utmost importance and unethical behavior will not be tolerated. Employees have a duty to refrain from any conduct that is illegal, dishonest, or unethical in appearance or in fact. We expect anyone who works for or represent Flexsys to conduct business in accordance with the letter, spirit and intent of all relevant laws and regulations.

This Code reflects the essential elements of ethical business conduct necessary for the Company's future success. We use these elements in working together as members of the Flexsys team and with the Company's key stakeholders.

Who does the Code apply to?

The Code of Business Conduct applies to everyone at Flexsys—officers, directors, and team members at all levels. It also applies to subsidiaries and controlled affiliates, as well as in joint ventures ("JVs") to the extent reasonable given Flexsys' level of participation. In situations where applying this Code is not possible, we will strongly encourage JVs or non-controlled affiliates to adopt and follow similar principles.

Employees working with third parties such as consultants, agents, sales representatives, distributors, independent contractors, etc. must require these parties to agree to comply with relevant aspects of the Company's compliance policies, to include taking action, up to and including termination of a contract after learning that a third party failed to abide by Flexsys compliance policies. Flexsys will provide these parties with education and information about the policy requirements.

Use of the terms "the Company," and "Flexsys" throughout this document refers collectively to all these entities.

What Must Employees Do?

Using the Code to guide our actions allows us to preserve our reputation for doing business the right way. To this end, each of us must:

BE KNOWLEDGEABLE

- Read and understand the Code.
- Learn and understand the details of any aspect of the Code that is relevant to your individual job responsibilities.

- Complete training on the Code and other assigned educational courses in a timely manner.

BE COMMITTED

- Abide by the Code.
- Seek advice and guidance when we are not sure of a situation.
- Promptly raise any concerns about violations or potential violations of the Code or any applicable laws, rules or regulations.
- Cooperate fully and honestly in investigations.

BE AWARE

- Understand that Flexsys may review, audit, monitor, intercept, access and disclose information processed or stored on Company equipment or technology, or on personally-owned devices permitted Company network access.

Holding a management position at Flexsys means accepting an additional set of responsibilities. We expect our managers to demonstrate a strong commitment to leadership and creating a culture of compliance. If you are a manager, you should:

PREVENT

- Personally set the example for integrity, not just through words, but more importantly, through actions.
- Ensure all team members know and understand this Code, Company policies, and all applicable laws, rules or regulations.
- Create an open environment in which every employee feels comfortable asking questions and raising concerns.
- Understand the risks that exist in your area of responsibility and those you oversee or interact with, and ensure appropriate controls are in place to mitigate those risks.

DETECT

- Implement control measures and use diligence when reviewing records to detect heightened compliance risks and violations.

RESPOND

- Report any violations that you suspect are occurring.
- Promptly escalate reports from employees.

Our Code and the Law

Flexsys operations and team members are subject to the laws of many countries and other jurisdictions around the world. We are all expected to comply with the Code and all applicable government laws, rules, and regulations. If a provision of the Code conflicts with applicable law, always apply the most stringent standard. If you are uncertain what laws apply to you, or if you

believe there may be a conflict between different applicable laws, consult the Law Department before proceeding.

What are the consequences of violating our code?

Violations of our Code, policies, or the law may carry serious consequences for Flexsys and the individuals involved. We are each accountable for our actions. Employees and leaders who engage in unethical or illegal behavior, and those who direct, condone, approve, or facilitate such behavior, may be: subject to disciplinary action up to and including termination; subject to local laws; and in some instances, may be subject to prosecution by governmental entities. Our disciplinary process seeks to treat employees with dignity and respect, and disciplinary measures will be proportionate and consistently applied.

There is a cost to non-compliance. The following examples of conduct can result in disciplinary action (not an exhaustive list):

- Violating law or Flexsys policy or requesting that others do the same.
- Retaliating against another employee for reporting a concern.
- Failure to promptly report a known or suspected violation of the Code.
- Failure to fully and honestly cooperate in investigations of possible policy violations.
- Failure to demonstrate leadership and diligence to ensure compliance with Flexsys policy and law.

REPORTING CONCERNS

Seeking advice or reporting concerns and violations

Being the voice of integrity isn't always easy, but when we raise concerns, we make our Company stronger and protect our colleagues from harm. You have an obligation to promptly raise any concern or potential concerns when you see or otherwise become aware of a situation in which the principles of our Code are actually or potentially not being followed. Timely reporting may be critical in preventing harm.

Never hesitate to ask for help if you are in a situation and don't know what to do.

Flexsys offers several methods for raising concerns or asking a question. Generally, your supervisor or manager will be in the best position to resolve any concerns, but other resources include: Human Resources Representative or Human Resources Manager or Legal Team. You can report your concern anonymously.

How we handle Investigations

Flexsys takes all reports of actual or potential misconduct seriously. The Company will investigate the matter confidentially and fairly to determine whether the Code, other Company policy, or the law has been violated. If you are asked to participate in an investigation, you are expected to cooperate fully and answer all questions completely and honestly. It is Company policy to ensure that all investigations are conducted in compliance with applicable laws.

During the investigation process Flexsys:

- Assigns an investigation team comprised of experts with the right knowledge and objectivity.
- Determines the facts through interviews and/or the review of documents.
- Recommends the corrective action, if necessary.
- Provides the person who raised the original concern, if not raised anonymously, with feedback as appropriate.

No Retaliation

We value your help in identifying actual or potential problems that the Company may need to address. We believe it's important that employees aren't afraid to speak up about any issues. Therefore, no disciplinary action or retaliation will be taken against an employee for bringing a concern to the Company's attention in good faith, even if the investigation determines that no violation could be found. Similarly, the Company will not tolerate retaliation against an employee or other person who cooperates in an investigation. If you ever feel that you have been retaliated against or threatened with retaliation, promptly report the matter to your direct supervisor, Human Resources, or any of the additional channels listed above.

HUMAN RIGHTS

Flexsys wants to ensure our employees can thrive in an inclusive workplace free from all forms of harassment, including unfair discrimination, sexual harassment and sexual misconduct. We strive to protect our employees against inappropriate actions that are unwanted and/or unwelcome and/or which create an intimidating, offensive, or hostile work environment.

Harassment

Harassing behavior creates an uncomfortable workplace where colleagues don't trust each other—which keeps us from reaching our goals. For these reasons, harassment has no place at Flexsys and will not be tolerated. Harassment includes all inappropriate conduct that creates a disrespectful, intimidating, hostile, degrading, humiliating, or offensive environment.

The Company's anti-harassment policy applies to all persons involved in its operations, regardless of their position, and prohibits harassing conduct by any employee of Flexsys, as well as from managers, suppliers, contractors, or customers. Harassment can range from extreme forms such as violence, threats, or physical touching, to less obvious actions like ridiculing, teasing, or repeatedly bothering coworkers or subordinates or refusing to talk to them. Examples of harassment may include behavior such as:

- Verbal conduct including taunting, jokes, threats, epithets, derogatory comments or slurs based on an individual's legally protected status;
- Visual and/or written conduct including derogatory posters, photographs, calendars, cartoons, drawings, websites, social media, emails, text messages or gestures based on an individual's legally protected status; and

- Physical conduct including assault, unwanted touching or blocking normal movement because of an individual's legally protected status.
- Bullying or mobbing, which includes systematic, sustained or repeated hostile behavior, either in-person or through email, social media, and other digital communications, intended to humiliate, isolate or exclude an individual.

This list is not exhaustive and there may be other behaviors that constitute Harassment. A single incident that has a lasting harmful effect on a coworker, or a series of incidents may be Harassment.

Sexual Harassment

Sexual harassment includes various forms of offensive behavior based on sex. Sexual harassment includes unwanted sexual advances, unsolicited sexual attention, requests for sexual favors or visual, verbal or physical conduct of a sexual nature when:

- Submission to such conduct is made a term or condition of employment; or
- Submission to, or rejection of, such conduct is used as a basis for employment decisions affecting the individual; or
- Such conduct has the purpose or effect of unreasonably interfering with an employee's work performance or creating an intimidating, hostile or offensive working environment.

Diversity

We embrace and celebrate the unique experiences, perspectives and cultural backgrounds that each employee brings to our workplace. Flexsys strives to foster an environment where our employees feel respected, valued and empowered, and our team members are at the forefront in helping us promote and sustain an inclusive workplace. An inclusive global culture allows us each to contribute our best to the team. Diversity is about capitalizing on each of our strengths and minimizing our weaknesses, allowing us to achieve together what we could not as individuals.

Fair Employment Practices

Fair employment practices do more than keep Flexsys in compliance with applicable labor and employment laws. They contribute to a culture of respect. Flexsys is committed to complying with all laws pertaining to freedom of association, privacy, collective bargaining, immigration, working time, wages and hours, as well as laws prohibiting forced, compulsory and child labor and employment discrimination. Beyond legal compliance, we strive to create an environment considerate of all employees wherever Flexsys business is being conducted.

Discrimination

Because of our commitment to diversity, we never make employment decisions based on personal characteristics other than skills, abilities, and potential. We will not tolerate discrimination in hiring, compensation, or promotion opportunities based on race, ethnicity, religion, gender or gender identity, sexual orientation, age, disability, national origin, or any status protected by applicable law.

Privacy

A growing number of countries are more stringently regulating the collection and use of employees' and consumer's "personal data," although the types of data covered, the nature of the protection, and local enforcement mechanisms vary. We all provide various types of personal data to the Company, and we all share the responsibility for ensuring that this data remains secure and confidential. Personal data is any information that directly or indirectly identifies a person. This information may include:

- Name
- Home and office contact information
- Government-issued identification numbers
- Marital status
- Medical history
- Other data

Flexsys is committed to handling personal data responsibly and will use, maintain, and transfer personal data in accordance with Company policies and applicable privacy law. If you have access to this information, ensure that you access only the information that is necessary for your job responsibilities, and that you always understand and comply with relevant privacy laws.

If you learn that personal data has been used in violation of our privacy practices, or if you learn that the security of any system or device containing personal data has been compromised, immediately notify your manager, human resources, or company legal counsel.

Freedom of Association and Right to Collective Bargaining

Flexsys has a strong and continuing commitment to meet or exceed the needs of its team members. Our policies and practices are designed to support an empowered and highly motivated workforce in an environment marked by open, honest communications and respect for every team member. Flexsys will uphold the freedom of association and recognize the right to collective bargaining, consistent with local laws, and will honor all of its legally mandated obligations.

Human Trafficking, Forced or Compulsory Labor, Child Labor

We uphold individual human rights including freedom from forced or compulsory labor and stand firmly against human trafficking. We seek to provide a safe, healthy, and desirable workplace with working conditions, wages, and benefits that meet or exceed applicable laws and reward performance. Flexsys complies with all child labor laws and supports the elimination of unlawful child labor and exploitation.

We expect the same ethical conduct from our business partners.

CONFLICTS OF INTEREST

Employees, officers and directors must act in the best interests of the Company. On the job or in your free time, nothing you do should conflict or give the appearance of conflicting with your responsibilities to Flexsys or otherwise hurt the Company's reputation. Even when nothing wrong is intended, the appearance of a conflict of interest can have negative effects. It is crucial to consider how your actions might appear, and to avoid actual, or perceived, conflict of interest.

What is a Conflict of Interest?

A conflict of interest arises when your personal interests or activities influence, or appear to influence, your ability to act in the best interests of Flexsys. Our policy requires that a Conflict Waiver be submitted to legal counsel before engaging in any activity, transaction or relationship that might give rise to a conflict of interest.

Determining whether a conflict of interest exists is not always easy to do. Employees with a conflict of interest question should seek advice from management or legal counsel.

The following are examples of prohibited conflicts of interest:

- Acting as a director, officer, consultant, agent or employee of a supplier, customer, competitor or any entity that engages in business with the Company;
- Owning a material interest in or being a creditor of or having other financial interest in a supplier, customer, competitor or any entity that engages in business with the Company;
- Receiving from or giving to any supplier, customer or competitor gifts, gratuities, special allowances, discounts or other improper advantages or personal benefits;
- Having any significant direct or indirect personal interest in a business transaction involving the Company;
- Conducting outside activities that materially detract from or interfere with the full and timely performance of an employee's job duties for the Company;
- Influencing commercial transactions involving purchases, contracts or leases in a way that would have a negative impact on the Company or its business.
- Employees may not authorize, execute, or approve any transaction in which we have a direct or indirect conflict of interest.
- A conflict of interest can also arise if a member of your household or a close personal acquaintance owns or works for a company that is one of Flexsys' suppliers, customers, or competitors. If you find yourself in that situation, you must not use your position to influence the bidding process or negotiation in any way. If you are directly involved in supplier selection or approval of invoices, notify management immediately and remove yourself from the decision-making process.

Personal Interests with Customer and Business Partners

We may not benefit, or seek to benefit, as individuals from the relationships that Flexsys has with its customers or business partners, including suppliers, vendors, contractors, agents, or distributors. Team members must be free from the influence of personal considerations when making recommendations or decisions.

Outside Employment

Flexsys respects each employee's right to engage in activities outside of employment such as those that are of a personal or private nature, to the extent that such activities do not create an actual or potential conflict of interest or adversely affect the employee's ability to perform their job. An example of an activity that might adversely affect an employee's ability to perform their job duties is outside employment. While the Company does not prohibit employees from

holding other jobs, the following types of outside employment are generally prohibited (to the extent allowed under applicable law):

- Employment that conflicts with the employee's work schedule, duties and responsibilities or creates an actual conflict of interest;
- Employment that impairs or has a detrimental effect on the employee's work performance with the Company;
- Employment that requires employees to conduct work or related activities during working times or using any of the Company's tools, materials or equipment; and
- Employment that directly or indirectly competes with the business or the interests of the Company.

For the purposes of this section, self-employment is considered outside employment.

Financial Interest in Other Organizations

We must ensure that our personal investments do not put us in competition with Flexsys. As Flexsys employees, none of us may have a significant investment or other financial interest in the business of a customer, a supplier, a competitor, an agent or distributor, or an actual or potential participant in a transaction or other business venture involving Flexsys. This restriction also applies to members of our households and our close personal acquaintances.

Relatively small investments in the securities of publicly owned corporations would not normally be considered a violation. Similarly, we may not own or work for a business that provides services to Flexsys —unless we receive prior written approval through a Conflict of Interest Waiver. Again, this also applies to members of our households and our close personal acquaintances.

Serving on Boards for other companies

We must also refrain from serving in any capacity—including as a director, officer, partner, consultant, employee, distributor, or agent— for companies that compete or do business with Flexsys, unless the relationship is disclosed and approved in advance by legal counsel. Under certain circumstances, approval will also be needed from an Executive Team member. Positively impacting your community by serving on a board of directors for a charitable organization or professional association is encouraged and does not require prior approval. However, you should only accept a position if it does not interfere with your ability to perform your job.

Personal Relationships with Other Employees

Close personal relationships between team members outside of working hours and off Company property are generally outside of the consideration of Company policy. However, Company policy prohibits:

- Relationships that become a disruption in the workplace.
- A manager engaging in a relationship with anyone in his or her line of supervision.
- A manager supervising a family member or someone living in his or her household.

- Relationships in which one team member can influence another team member's employment or termination decisions, job benefits or pay, assignments, promotions, performance reviews, discipline or any other employment term or condition.

A "close personal acquaintance" includes any individual with whom you share a close personal relationship and from whom you could benefit financially either directly or indirectly, immediately or at some time in the future. Examples may include members of your extended family, individuals with whom you share a cultural closeness such as godparents, lifelong friends, or others living within that person's household.

Disclosure of Conflicts of Interest

The Company requires that employees and directors disclose any situation that reasonably would be expected to give rise to a conflict of interest. If you suspect that you have a situation that could give rise to a conflict of interest, or something that others could reasonably perceive as a conflict of interest, you must report it in writing to your supervisor or the General Counsel, or if you are a director or executive officer, to the Board of Directors. The Company's General Counsel or the Board of Directors, as applicable, will work with you to determine whether you have a conflict of interest and, if so, how best to address it. All transactions that could give rise to a conflict of interest involving a director, executive officer or principal financial officer must be approved by the Board of Directors, and any such approval will not be considered a waiver of this Code.

BUSINESS COURTESIES

Flexsys is committed to competing solely on the merit of our products and services. We should avoid any actions that create a perception that favorable treatment of outside entities by Flexsys was sought, received or given in exchange for personal business courtesies. Business courtesies include gifts, gratuities, meals, refreshments, entertainment or other benefits from persons or companies with whom Flexsys does or may do business. We will neither give nor accept business courtesies that constitute, or could reasonably be perceived as constituting, unfair business inducements that could potentially violate law, regulation or policies of Flexsys or customers, or would cause embarrassment or reflect negatively on Flexsys' reputation.

Giving and Receiving Gifts, Entertainment, and Travel Gifts

Exchanging token gifts and entertainment can help build goodwill in business relationships. In many countries where we operate, these practices are an integral part of doing business. However, some entertainment or gifts can make it difficult for us to remain objective about the person or company we are dealing with. When interacting with business associates, we must be careful when offering, giving, or receiving gifts, providing meals or entertainment, and paying for travel.

Although we may not use our position at Flexsys to obtain business courtesies, and we must never ask for them, we may accept unsolicited business courtesies only if the item is of minimal value, complies with the recipient's own laws and corporate policies, and is not given with any corrupt intent to improperly influence business decisions. As a general rule, gifts and hospitality may only be provided for legitimate business purposes, to show regard or esteem, and for the

purpose of developing customer relations. The prudent course is to refuse a courtesy from a supplier when Flexsys is involved in choosing or reconfirming a supplier, or under circumstances that would create an impression that offering courtesies is the way to obtain Flexsys' business.

Examples of a gift that may conform to the reasonable ethical practices of the marketplace include items such as:

- Flowers, fruit baskets and other modest presents that commemorate a special occasion.
- Gifts of nominal value, such as calendars, pens, mugs, caps and t-shirts (or other novelty, advertising or promotional items).

Employees may not accept compensation or money of any amount from entities with whom Flexsys does or may do business. Tangible gifts (including tickets to a sporting or entertainment event where the giver is not in attendance) that have a market value greater than \$100 may not be accepted unless approval is obtained from the legal team.

Any gifts or entertainment provided to a third party must be properly reflected in our Company's books and records. Additionally, giving gifts and entertainment should not occur on a frequent basis. We are not permitted to provide or receive gifts or entertainment with the intent to inappropriately influence or induce business. In fact, such practices are not only against Company policy, but also may violate anti-corruption laws, and may be true regardless of whether we are giving or receiving.

Keep in mind that we and our family members may accept discounts on personal purchases of a supplier's or customer's products only if such discounts are offered to all other Company employees.

A **gift** is any item of value given to or received from someone who is not an employee of Flexsys. If the person providing the meal, tickets, or entertainment is not attending the event, it is considered a "gift" —and it must meet Company guidelines for appropriate gifts.

Entertainment is a situation such as meal or event outside the workplace where both a representative from the giver and recipient are present. Providing or accepting entertainment may be allowed under the following:

- The purpose is to hold bona fide business discussions or to foster better business relations;
- It is consistent with acceptable business customs and practices;
- It is not illegal or in violation of the other party's ethical guidelines;
- It is of reasonable value and would be paid by normal expense account procedures;
- It is not solicited by the recipient;
- It cannot be construed as a bribe, payoff, or kickback;
- It is not provided or accepted on a repeated basis;
- It will not cause, or be perceived to cause, the recipient to alter normal business judgment concerning any transaction with the Company; and
- It will not be an embarrassment to the Company or the employee if publicly disclosed.

Some regions and business units have internal guidelines and policies that are more restrictive than those outlined above or require certain levels of approval for accepting or providing gifts or entertainment. In these situations, you must follow the applicable guidelines.

Travel

From time to time, there may be a justifiable business purpose for us to provide business travel for a third party or receive business travel from a third party. Any such travel is subject to special rules. You must follow the travel policies in your specific jurisdiction.

Inappropriate Gifts and Entertainment

Any form of gift or entertainment that could reasonably be expected to negatively impact the Company's reputation is prohibited. You should avoid excessive alcohol consumption when you are in social situations with business partners. Do not provide or accept entertainment at adult entertainment venues (including gentleman's clubs, any establishment with scantily dressed or nude performers, or any establishment offering services of prostitutes or sexually-oriented entertainment) or paid sexual favors while on Company business, even if any expense is paid with personal funds.

Government Officials

Special restrictions apply when dealing with government employees and/or government officials. A government employee and/or government official means (i) any official, officer, employee or representative of, or any Person acting in an official capacity for or on behalf of, any governmental authority, (ii) any political party or party official or candidate for political office or (iii) any company, business, enterprise or other entity owned, in whole or in part, or controlled by any Person described in the foregoing clause (i) or (ii) of this definition. Consult with human resources to determine whether there are any special restrictions before engaging in a business relationship with any government or government-owned entity. Under no circumstances should any gifts, entertainment, meals, transportation, lodging, or other things of value be given to any government employee without prior, written approval from legal counsel.

PROTECTION AND USE OF CONFIDENTIAL INFORMATION

Protection of Company Information

Flexsys confidential and proprietary information is vital to its current operations and future success. Each employee should use all reasonable care to protect or otherwise prevent the unauthorized disclosure of such information.

In no event should employees disclose or reveal confidential information within or outside the Company without proper authorization or purpose.

"Confidential Information" refers to a piece of information, or a compilation of information, in any form (on paper, in an electronic file, or otherwise), related to the Company's business that the Company has not made public or authorized to be made public, and that is not generally known to the public through proper means.

Unauthorized disclosure of confidential information could cause competitive harm to the Company or its collaborators, customers or suppliers and could result in legal liability to you and the Company. Confidential and proprietary information includes such things as trade secrets, pricing and financial data, Flexsys business methods and plans, technology, intellectual property (such as trademarks, copyrights, patents, and inventions), research and development, customer lists and methods of competing, or nonpublic information about other companies, including current or potential supplier and vendors. This list is an example of the types of confidential or proprietary information and in no way represents a full listing. We will not disclose confidential and nonpublic information without a valid business purpose and proper authorization.

Our future growth depends in part on the success of our innovation efforts. Remember, any invention or other intellectual property you create while employed by Flexsys that relates to the Company's existing or contemplated business is the exclusive property of Flexsys.

Confidential Information Provided by Other Companies

Flexsys' policy is not to accept information that could be deemed confidential, restricted, or limited in its disclosure or use, unless a written agreement specifying the rights and obligations of all parties has been approved by the Company's Law Department and signed by an authorized representative of each party.

A properly executed agreement ensures that Flexsys business, research, development, and technical services are not compromised. Such an agreement can also prevent other parties from claiming an unwanted confidential relationship. Until such an agreement is in place, you should refuse to discuss or accept the confidential information of others.

Examples of such confidential information could include:

- Unsolicited disclosures by outside inventors.
- Drawings and manuals that bear markings asserting confidentiality.
- Proprietary designs, processes, methods, systems, procedures, or formulas.
- Confidential financial information or business planning documents.

Information about other Companies

It is important that we respect the property rights of others. We will not acquire or seek to acquire improper means of a competitor's trade secrets or other proprietary or confidential information. We will not engage in unauthorized use, copying, distribution or alteration of software or other intellectual property. All forms of industrial espionage are prohibited. We must never expect team members who formerly worked for a competitor to reveal that company's confidential information.

Insider Trading

In the course of your job, you may learn of material information about Flexsys or other companies before it is made public. Using this information for your financial or other personal benefit or conveying this information to others constitutes a violation of this policy and may even violate the law. Confidential Company information should never be used for personal gain. Employees may never buy or sell stock in a company while in possession of material nonpublic (inside) information about that company.

Using this information for your financial or other personal benefit or conveying this information to others constitutes a violation of this policy and may even violate the law. This includes buying or selling the securities of any company about which you have material non-public information and giving this “inside information” to anyone else who might base financial trades on the information you’ve shared.

Information is considered material if a reasonable investor would consider it important in deciding whether to purchase, sell, or retain a security. Information is nonpublic if it has not been made generally available to investors (by means of a press release, for example). Information that fits both descriptions is considered inside information.

Examples of inside information include:

- plans for mergers or significant acquisitions
- earnings and financial results prior to release
- news of major changes in senior management or organizational structure
- threatened litigation or changes in the status of an ongoing lawsuit
- gain or loss of important contracts or customers
- planned action regarding our stock
- product developments or discontinuations

In addition, if you possess inside information, you must not communicate, or tip, that information to family, friends, or others who may trade (or advise others to trade) in Flexsys, or other Company’s, stock. In addition to the restrictions indicated above, further restrictions apply to Flexsys’ officers and directors. Violation of insider trading laws can result in severe fines and criminal penalties, as well as disciplinary action by the Company, up to and including, for an employee, termination of employment or, for a director, a request that such director resign from the Board of Directors. Contact the Law Department if you have questions about trading stock.

External Communications and Requests

To ensure that Flexsys communicates with the media in a consistent, timely and professional manner about matters related to the Company, you should notify your manager that you have been contacted by the media whenever you are asked to speak on behalf of the Company so that the Company knows that a media inquiry has been made. Do not respond to media inquiries on the Company’s behalf without authorization. No one may issue a press release without first getting written approval from the Company Chief Marketing Officer. This requirement does not prevent you from speaking with the media, but you should not attempt to speak on behalf of the Company unless you have specifically been authorized to do so by an officer of the Company.

Similarly, only people authorized by the Chief Financial Officer or Investor Relations may speak on behalf of Flexsys to members of the financial community, such as securities analysts, stockholders, or fund managers.

All marketing communications must follow the review and approval processes established by Marketing Communications. This includes marketing communications on the Company’s web site, social networking outlets, and e-marketing campaigns such as search engine optimization,

videos, banner ads, and webinars. These processes help ensure that Company communications are appropriately grounded in established standards of scientific inquiry and do not mislead stakeholders or inadvertently disparage competing products.

Social Media

The importance of consistent, accurate communication also applies to social media. Unless you have been trained and approved as a Company spokesperson, you should not speak on Flexsys' behalf in any social media arena. Be aware of the following considerations:

- Personal social media entries concerning the Company should have clear disclaimers that the views expressed by the author are the author's alone and do not represent the views of the company.
- Information published on your personal social media should comply with the company's confidentiality and disclosure of proprietary data policies with respect to trade secrets and other business-related information.
- Social media activities should not interfere with work commitments.
- Do not reference or cite company clients, partners, or customers without their express consent. In all cases, do not publish any information regarding a client during the engagement.
- Company logos and trademarks may not be used without written consent.

RECORDS INTEGRITY

Corporate Recordkeeping & Records Management

Company records must be true, accurate, and complete. Records could include accounting records, expense statements, financial and research reports, and time records. Improper or fraudulent accounting, documentation, or financial reporting violate Company policy and may also violate applicable laws, including but not limited to anti-bribery statutes. All corporate records must be true, accurate and complete, and company data must be promptly and accurately entered in our books in accordance with Flexsys' and other applicable accounting principles.

We create, retain and dispose of our company records (in both physical or electronic form) as part of our normal course of business in compliance with all Company policies and guidelines, as well as all regulatory and legal requirements.

Fraud

Keeping accurate records also helps us prevent and detect fraud. Fraud generally involves taking something you are not entitled to, or lying to receive something of benefit for yourself. It is prohibited, both within our Company and in all external dealings.

Fraud specifically includes, but is not be limited to:

- Theft of Company property
- Forgery
- Misappropriation of funds, securities, supplies, or any other Company asset
- Irregularities involving money transactions
- Falsification of expense statements, time records or any other Company record

- Improper financial reporting or recording fictitious or misleading transactions in financial records
- Bribery
- Tax evasion

Fraud also includes any irregularity or suspicion of any irregularity involving vendors, customers, Company personnel, agencies, unknown parties, or Company property.

No Improper Influence on Audits

We each have an obligation to cooperate with any internal audits or external audits conducted by our Company's external audit firm. In these situations, always tell the truth and comply with any requests for information. We must not improperly influence, manipulate or mislead any unauthorized audit, nor directly or indirectly interfere with any auditor engaged to perform an internal independent audit of Flexsys' books, records, processes or internal controls.

We are often also subject to audit requests from customers or other parties. Contact your management or the Law Department if you have questions regarding the Company's obligations for this type of audit

Accurate Public Disclosures

We will make certain that all disclosures made in financial reports and public documents are full, fair, accurate, timely and understandable. This obligation applies to all employees, including all financial executives, with any responsibility for the preparation for such reports, including drafting, reviewing and signing or certifying the information contained therein. No business goal of any kind is ever an excuse for misrepresenting facts or falsifying records.

Employees should inform Executive Management and legal counsel if they learn that information in any filing or public communication was untrue or misleading at the time it was made or if subsequent information would affect a similar future filing or public communication.

PARTNERSHIPS

Payments for Products and Services

We are committed to sound business practices in all our relationships with customers, suppliers, and other business associates. In all situations, we must exercise good judgment to avoid the appearance of inappropriate conduct. Sales-related commissions, rebates, discounts, credits, and allowances are customary business payments. However, we must be sure to avoid illegal or unethical payments and must comply with applicable currency exchange controls and regulations.

Payments that our Company makes or receives should be:

- Reasonable in value, relative to the goods or services provided and to industry norms.
- Properly documented in agreements reviewed and approved by the Law Department. The documentation should clearly define the nature and purpose of the transaction.
- Payable to the appropriate business entity, not its individual officers, employees, or agents, and not payable to another business entity. The payment terms, payment method, and process for sending the payment should be defined in the agreement.

- Charged to the business entity or product benefiting from the payment. The company should provide full visibility regarding any payments and should not charge the payment to a non-related account.

Anti-Corruption

The Company expects all personnel to act with integrity and maintain the highest level of professional and ethical standards, and to comply with all applicable anti-corruption and anti-bribery laws, including the U.S. Foreign Corrupt Practices Act (“FCPA”), the UK Bribery Act 2020, and any other similar national and international laws that apply to our operations.

We have a zero-tolerance policy for bribery, corruption, kickbacks, or similar misconduct. Employees and agents are prohibited from offering, promising, paying or authorizing the payment, directly or indirectly, of anything of value to any person to:

- improperly influence any act or decision (by a government official or private actor);
- improperly obtain or retain business (i.e., renewing a contract, securing a sale); or
- secure any improper business advantage (i.e., securing favorable pricing, avoiding a regulatory fine, securing a business permit, reducing customs charges, obtaining environmental certifications, or gaining access to confidential competitor information).

We also prohibit employees from accepting or soliciting anything of value as a bribe or quid pro quo related to our business. This prohibition applies even if only the employee (and not the Company) benefits from the bribe.

In addition to prohibiting bribery directly by employees, the Company also prohibits corrupt payments and bribery by or through third parties. We expect our partners, manufacturers, suppliers, contractors, sub-contractors, and other third parties to comply with the FCPA and other applicable anti-corruption laws. Failure to comply with the FCPA or other anti-corruption laws could result in significant consequences, including civil or criminal fines, loss of export privilege, debarment from government contracts, reputational damage, and disruptive and costly investigations. Employees who violate applicable anti-corruption laws will be subject to appropriate discipline, up to and including termination. We will also take appropriate action against suppliers and other third parties that violate anti-corruption laws, consistent with applicable laws and contractual terms

Flexsys sells and purchases products and services on the merits of competitive pricing, quality of work and materials, and timely performance. This means we never give, offer, or accept improper payments in any form. Many countries in which we do business have laws that strictly prohibit giving, receiving, offering, or soliciting bribes, kickbacks, and other improper benefits or payments.

A **bribe** is anything of value or an improper favor given or offered in an attempt to influence an individual’s actions or decisions. These actions or decisions could take the form of helping Flexsys obtain or retain business or acquire any sort of improper advantage. For example, the advantage might be providing information that is normally unavailable or allowing Flexsys to submit a late bid or proposal.

A ***kickback*** is a commonly used form of negotiated bribery by which the bribe-giver pays a commission to the bribe-receiver as a quid pro quo for services rendered. This often happens through fraudulent or inflated invoices, so that the bribe-giver in return receives a piece of the paid amount.

Facilitating or expediting payments

When working with government employees and/or government officials, we must never agree to pay facilitating payments, even if we are working in areas where they may be a common practice. Facilitating or expediting payments, which are generally small payments made directly to a government employee or government official to secure timely performance of routine governmental actions that the Company is entitled to under local law, are not permitted. Such actions include obtaining permits and licenses, processing visas and work permits, mail pickup and delivery, and providing telephone and water service and supply. Payments made directly to a government agency according to a publicly available schedule of fees are allowed. Any such payments must be recorded as a business expense in the Company's books and records.

Any questions about the legality of any contemplated gift or payment to an official or elected representative should be directed to our legal team.

BUSINESS INTEGRITY

Fair Dealing

We endeavor to deal fairly with our customers, suppliers, competitors, and each other. We never take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair practice. Flexsys does not promote its business by disparaging its competitors, their products, or their services.

Truthfully Market, Promote, and Advertise our Products

We market, promote, and advertise our products in a fair, truthful, and ethical manner. We will never misstate the facts or mislead customers in our advertisements, labeling, packaging, or promotions.

Competition Law / Antitrust Law

Flexsys is dedicated to ethical, fair and vigorous competition. We will sell our products and services based on their merit, superior quality, functionality and competitive pricing. We will make independent pricing and marketing decisions and will not improperly cooperate or coordinate our activities with our competitors. It is also critical that we avoid any activity that could violate or give the appearance of violating competition laws.

Competition and antitrust laws:

- Prohibit agreements or understandings between competitors that undermine competition;
- Regulate the behavior of dominant companies; and
- Require prior review and in some instances clearance for mergers, acquisitions and certain other transactions, in order to prevent transactions that would substantially reduce competition.

These laws are complex, and global in reach, and can operate differently in any particular situation. It is often essential that you involve legal counsel early in the process of developing new commercial initiatives given the many uncertainties that arise in the application of these laws.

In all contact with competitors, avoid any conduct that suggests an understanding or agreement exists with respect to prices, terms of sale, production for third parties, or allocation of customers, markets, or territories. To this end, avoid any discussion or communication with any representative of a competitor related to the following:

- Prices
- Pricing policies
- Bids
- Discounts, rebates, royalties, or promotions
- Credit or shipment terms, or other conditions of sale
- Choice of customers or allocating customers between competitors
- Dividing up a territory between competitors
- Products to be manufactured or sold production quantities or quotas (that is, agreements between competitors as to the amount of products to be manufactured and/or sold by each or the addition of new capacity)
- Employee compensation practices

The following are practical suggestions:

- If a competitor invites you to discuss pricing or other prohibited subjects, end the discussion immediately and report it to our legal team or management.
- Do not exchange price lists, bids, terms, or conditions of sale with a competitor, except in connection with a bona fide sale to, or purchase from, that competitor.
- Do not ask someone to determine what competitors will do in response to a proposed price move if obtaining an answer would involve contacting a competitor. Do not do anything indirectly that would be a violation of law if done directly. “Signaling” price moves among competitors can be tantamount to an agreement on prices.
- Refrain from discussing pricing or other matters detailed above during any acquisition, divestiture, or joint venture negotiation or other legitimate contact with our competitors without approval from the Law Department.

Reciprocal dealing

Flexsys’ decision to buy goods and services from a supplier must be made independently from the supplier’s decision to purchase products or services from our Company.

Benchmarking and information exchanges

Benchmarking is a structured approach for exchanging and analyzing information. Before we exchange information with a competitor or benchmark ourselves against them—whether directly or through a third party or consultant—we must determine whether there are competition concerns. This is because such exchanges could include information about prices and terms of sales, credit practices, costs, productions levels, future plans, and compensation,

which could violate antitrust laws. Accordingly, any such benchmarking or information exchanges must be approved in advance by the Law Department.

Trade and credit associations and industry groups

Trade and credit associations and industry groups typically involve meetings of competitors. These groups should arrange for legal counsel to be present at all meetings to ensure compliance with competition laws. Request written approval from the Law Department before applying for membership in one of these organizations. Be aware of antitrust related topics and activities. Never talk with other members about your business's current or future prices or marketing efforts. When the conversation strays into commercially sensitive topics, make other members aware and pull the discussion back on track. If that does not help, leave the meeting and make sure that your concerns have been clearly documented in the minutes.

International Trade Compliance

International Trade Control (ITC) laws affect the transmission (import, export, or re-export) of goods, services and technology from one country to another. These laws apply to many aspects of Flexsys' operations — not just shipping products. Exchanges of information across national boundaries, including e-mail and web access, are also subject to trade controls. It is important that we carefully observe ITC laws in connection with these activities. Flexsys' policy is to comply with all applicable export regulations worldwide.

Follow the below guidelines in dealing with ITC laws:

- Follow relevant ITC regulations of all countries in which you operate and Flexsys' procedures as they relate to importing and exporting goods, technology, software, services and financial transactions.
- Always know what you're exporting, its destination, the end user, and the end use.
- Check the export classification of the product, software or technology prior to export to determine whether special authorization is required.
- Be sure to provide Customs with complete, accurate and timely import and export documentation.
- Obtain approval from the Customs team before hand-carrying any commercial product across a border.
- Screen business partners, suppliers and parties involved in any international transactions to ensure actions do not violate trade or sanctions requirements or prohibited end uses in the countries in which we conduct business.
- Report all relevant information to your import and export manager to ensure accurate and complete import/export declarations.

For questions regarding any potential import or export, review the matter with the organization's trade compliance representative or legal team.

Sanctions, Embargoes, and Anti-Terrorism

Company policy prohibits the use of Company assets or personnel to finance or otherwise aid terrorist groups or activities. Additionally, as a global company headquartered in the U.S., we are subject to U.S. and other global laws relating to sanctions and embargoes. These laws also

prohibit transactions with terrorists and narcotics traffickers and imports from designated foreign persons who promote the proliferation of weapons of mass destruction. Any proposed dealing with a country or entity subject to these sanctions or embargoes must be reviewed by the legal team to determine whether the proposed conduct is allowable under the law. This also applies to deals made indirectly through third party business partners.

Money Laundering

People involved in criminal activity — e.g., terrorism, narcotics, bribery, and fraud — may try to “launder” the proceeds of their crimes to hide them or make them appear legitimate. Flexsys will comply with all laws regarding the prohibition of money laundering. Flexsys will conduct business only with reputable customers involved in legitimate business activities, with funds derived from legitimate sources. Prior review and approval from our treasurer is required for any questionable financial transactions involving transfers of cash or cash equivalents. Failing to detect customer relationships and transactions that place our Company at risk can severely damage our integrity and reputation.

What to watch out for:

- A customer, agent, or proposed business partner who is reluctant to provide complete information, provides insufficient, false or suspicious information, or is anxious to avoid reporting or record keeping requirements.
- Payments using monetary instruments that appear to have no identifiable link to the customer, or have been identified as money laundering mechanisms.
- Attempts by a customer or proposed business partner to pay in cash.
- Early repayment of a loan in cash or cash equivalents.
- Orders, purchases or payments that are unusual or inconsistent with the customer’s trade or business.
- Unusually complex deal structures, payment patterns that reflect no real business purpose, or unusually favorable payment terms.
- Unusual fund transfers to or from countries unrelated to the transaction or not logical for the customer.
- Transactions involving locations identified as secrecy havens or areas of known terrorist activity, narcotics trafficking or money laundering activity
- Transactions involving foreign shell or offshore banks, unlicensed money remitters or currency exchangers, or nonbank financial intermediaries.
- Structuring of transactions to evade recordkeeping or reporting requirements (for example, multiple transactions below the reportable threshold amounts).
- Requests to transfer money or return deposits to a third party or unknown or unrecognized account.
- Questionable addresses: e.g. PO Box; vague locations: e.g. “JAFZA” with no defined address.

Anti-Boycott

Flexsys will not participate in or support economic boycotts or restrictive trade practices that are prohibited under applicable law. As a global company, we must take care that nothing we do or say could be seen as participating in an illegal boycott. For example, we may not certify that

an entity is not blacklisted, or provide information on a company's activities with a boycotted entity. Boycott-related requests are often received orally or in the form of a contract bid, purchase order, insurance verification, letter of credit, shipping document, or joint venture or alliance negotiations. Any request to participate in or support an illegal economic boycott must be reported to the government. Failure to do so is a violation of law. Any boycott request must be forwarded to the Law Department for compliance reporting purposes.

Individual and Corporate Political Activities

Flexsys encourages employees to be active in political affairs in their personal capacities, including holding elected office. However, these activities should be limited to your own time and resources. Employees may not use Company resources such as equipment, e-mail, phones, computers and copiers in support of their political activities. Employees will not be reimbursed for any financial contribution or in-kind support, without specific, prior approval from Flexsys' legal team. Employees who appear in campaign or political advertising must make it clear that they are appearing in their personal capacities and not as a spokesperson for the Company. This can prevent any conflict of interest and ensures that we comply with all applicable laws. If you wish to seek public office, be aware of applicable policies and discuss the matter with Flexsys' legal team and your management.

Charitable Giving and Donations

Flexsys fully supports charitable giving to approved organizations as a way to support our communities and Company philanthropic objectives. However, when the charitable organization has links to a foreign government, for instance through ownership, specific care must be taken to ensure against allegations of bribery or corruption. For that reason, donations Flexsys makes outside of the United States-always need prior approval from legal counsel. Donations in the United States must have prior approval from legal counsel. Flexsys donations must be properly recorded. Of course, employees can each make personal donations to charitable organizations, but not on behalf of the Company.

Government Contracting

There are complex regulations that apply to government contracts. These regulations have restrictions that can be significantly different from those that apply to our contracts with private commercial entities. Government procurement regulations cover pricing, cost accounting, quality control and testing, paying gratuities and kickbacks to government employees, hiring or retaining former government employees, and the confidentiality of government information. Seek advice from the Law Department when evaluating government contracting.

ENVIRONMENT, HEALTH & SAFETY

Protecting the environment and the health and safety of employees is the law — and we believe it's also the right thing to do. Through management leadership and employee commitment, Flexsys works to conduct its operations in a safe manner that minimizes environmental impact. This policy affects all company activities — not just managing our waste and emissions, but everything we do —for example,

selling products, driving a car on company business, acquiring a new business or providing customer service.

Providing a Safe and Health Workplace

Each of us needs to have a working knowledge of the environmental, health and safety laws, regulations, and Company policies that apply to our area of responsibility. We should also be aware of the resources that are available in the Company to help us comply with these rules.

Flexsys will provide and use safety devices, safeguards and use work practices, methods, processes and meant to control hazards and avoid risks, to make your workplace safe.

We expect employees to follow these basic guidelines:

- Study and follow all safe practices that apply to their work.
- Coordinate and cooperate with all other employees in the workplace to try to eliminate on-the-job injuries and illnesses.
- Apply the principles of accident prevention in their daily work and use proper safety devices and protective equipment as required.
- Use and take care of all Personal Protective Equipment (PPE).
- Take time and use diligence to do their job safely.
- Report all job-related injuries or illnesses.
- Identify and eliminate hazards that may exist in the workplace.

Wellness of Team

We encourage employees to make personal choices to promote a healthy lifestyle that includes appropriate work-life balance.

Impairing Substances

At Flexsys, we must be free of impairment due to alcohol or drugs upon reporting to work and during all work time. To that end, we may not use or possess illegal drugs on Company property or while on Company business. This prohibition includes prescribed or over-the-counter drugs that are not being used as prescribed or intended.

Alcohol: Unauthorized possession or use of alcohol on Company property is prohibited. Use of alcohol off premises while on Company business is also prohibited if it results in:

- Impairment of the team member's business judgment or job performance
- Placing anyone's safety at risk.

Drugs: The possession, use, sale, manufacture or distribution of illegal drugs, and the abuse, misuse, or sale of prescription drugs, is also not allowed.

Driving under the influence

While driving a Company vehicle and/or while on Company business, in addition to following all traffic rules, we must never drive under the influence of alcohol or illegal or prescription drugs and are unable to safely operate the vehicle. Countries may have varying levels of legal impairment thresholds that you should be aware of.

If you are cited for an alcohol-related traffic violation while driving a Company-owned or leased vehicle (including rental cars), you must report the incident to management. If you regularly use a company-leased vehicle for your job (sales, for example), you must report any alcohol-related traffic citations, even if you were driving a different vehicle at the time.

Workplace Violence

Flexsys will not tolerate violence in the workplace in any form. Examples of workplace violence include physical assault, threat of physical harm or assault, stalking, and intimidation. If you know of or suspect incidents or threats of workplace violence, you must immediately report your concerns. If you believe someone is in immediate danger, contact plant protection or a member of corporate security.

Weapons

Firearms and other weapons are strictly prohibited on Company property (unless expressly permitted by local law). Company property includes but is not limited to Company-owned or controlled land—both developed and undeveloped—as well as Company buildings, parking lots, and vehicles. Temporary possession of a weapon on company property can be authorized by senior management for security personnel or a trained team member when it is necessary to ensure safety and security.

Protecting the Environment

We understand that contributing to a healthy environment is beneficial for the communities in which we operate and for business. To that end, we should continually assess and improve our processes in order to protect the communities in which we live. In order to do this, we conduct periodic risk assessments to identify potential hazards and then take appropriate precautions to minimize these risks. In these assessments, we consider not only scientific and economic factors, but also societal factors to ensure we perform a proper evaluation. We work to set a good example for the rest of our industry by striving to meet— or exceed—the environmental laws, regulations, and standards that apply to us. Each of us has a responsibility to report any practice that is harmful to the environment or does not comply with our Company's policies.

DOING THE RIGHT THING

Several key questions can help identify situations that may be unethical, inappropriate or illegal.

Ask yourself:

- Does what I am doing comply with Flexsys' guiding principles, Code of Conduct and company policies?
- Have I been asked to misrepresent information or deviate from normal procedure?
- Would I feel comfortable describing my decision at a staff meeting or to a neutral third-party?
- Am I willing to be held accountable for this decision?
- How would it look if it made the headlines?
- Am I being loyal to my family, my company and myself?

- What would I tell my child to do?
- Is this the right thing to do?

Remember:

- **Act** if you see an issue.
- **Ask** if you're not sure.