

# Tekgence Services

## Third-Party Global Code of Business Conduct



## TABLE OF CONTENTS

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1	Introduction to the Global Code of Business Conduct .....	3
1.1	Tekgence Code of Conduct .....	3
1.2	Policy Statement Concerning the Global Code of Business Conduct .....	4
2	Our Work Environment.....	5
2.1	Reporting Concerns .....	5
2.2	Equal Treatment of All .....	5
2.3	Security Obligations .....	5
2.4	Policy Against Harassment .....	5
2.5	Drugs and Alcohol .....	6
2.6	Global Workplace Health and Safety.....	6
3	Conflicts of Interest .....	7
3.1	Activities Outside the Company .....	7
4	Technology Use and Privacy .....	7
4.1	Information Security and Data Privacy .....	7
4.2	No Expectation of Privacy; Company Right of Access to Technology Resources .....	7
4.3	Prohibition Against Harassing, Discriminatory, Threatening, and Defamatory Use of Electronic Communication .....	8
4.4	Prohibition Against Violating Copyright Laws .....	8
4.5	Other Prohibited Uses .....	8
4.6	Passwords .....	8
4.7	The Internet and Online Services .....	8
4.8	Software Use License Restrictions .....	9
4.9	Confidential Information .....	9
5	Gifts, Gratuities, Entertainment and Other Considerations .....	10
5.1	Gifts and Entertainment Rules with Respect to Government Officials and Employees .....	10
5.2	Bribes and Kickbacks .....	10
6	Business Relationships .....	11
6.1	Customer Relationships .....	11
6.2	Privacy of Customer Communications .....	11

## TABLE OF CONTENTS

---

6.3	Working with Existing Suppliers .....	11
8	Doing Business Globally .....	12
7.1	No Payments to Low-Level Non-US Governmental Employers and Officials .....	12
8	The Government Securities Law and the Media .....	13
8.1	Inside Information and the Laws Against Insider Trading .....	13
9	Accuracy of Reports .....	14
10	Concerns Regarding Accounting, Auditing, Fraud, Money Laundering, or Internal Control Matters .....	15
11	Compliance and Reporting .....	16
11.1	Investigations .....	16
12	Summary .....	17

# 1 Introduction to the Global Code of Business Conduct

## 1.1 Tekgence Inc Code of Conduct

Tekgence Inc has a Code of Conduct, which describes basic standards and values for Tekgence Inc and their employees. Our Company has core principles, including:

- **Ethical and Responsible Business Activities**

- Tekgence Inc complies with applicable laws and regulations in the countries and regions where it does business, and have zero tolerance for any form of corporate criminal offences and illegal misconducts. Furthermore, Tekgence Inc respects international standards and acts in a highly ethical manner, in accordance with the social responsibility expected of a global company. These are our fundamental principles of behaviors necessary for Tekgence Inc to gain trust from society, enhance our corporate values, and safeguard our own sustainable development. We engage in our day-to-day business activities always in accordance with our fundamental principles.

- **Respect for Human Rights**

- Tekgence Inc complies with the Universal Declaration of Human Rights and other international treaties and conventions which are discussed and adopted from a global perspective, as common standards that all people and countries should achieve. As a member of Tekgence Inc. Tekgence understands fully and strives to realize the Tekgence Inc Global Human Rights Policy, which is part of Tekgence Inc core policies.

- Tekgence Inc endeavors not to cause or exacerbate any negative impact on human rights in the course of our business activities, and will not tolerate any forced labor or child labor. Further, Tekgence Inc endeavors to introduce and implement human rights due diligence procedures to identify and take measures on the risks concerning human rights, and to take serious action to resolve negative consequences to human rights.

- **Diversity, Equity & Inclusion**

- Tekgence Inc believes DEI (Diversity, Equity and Inclusion) is essential, because promoting and realizing DEI will bring about innovation in the world and lead to the sustainable growth and development of society. DEI is an environment in which people with diverse personalities, backgrounds, perspectives and values respect each other (Diversity), work under fair opportunities and conditions according to their circumstances (Equity), and each person makes the most of themselves to work in cooperation with each other (Inclusion).

## 1.2 Policy Statement Concerning the Global Code of Business Conduct

1. It is Tekgence Inc Services **2** policy to conduct its affairs in accordance with the highest moral and ethical principles and to comply with all applicable laws and regulations. This Code of Conduct ("Code") sets forth legal and ethical standards of conduct for contractors, independent contractors, agents, partners, third parties, supplemental labor and others who provide services to the Company (collectively referred to as "Third Parties), including without limitation the employees, contractors, agents, and subcontractors of such Third Parties.

Although it is the purpose of the Code to present a clear statement of what is expected of all, the Code cannot address all possible situations of concern that may arise. Nevertheless, in conjunction with providing services to Tekgence Inc, Third Parties are expected to comply and act in accordance with this Code at all times. Third Parties are likewise expected to use good judgment and common sense in seeking to comply with this Code, and to ask for advice if questions arise. This Code applies to the Company Controlled by it worldwide.

## 2 Our Work Environment

### 2.1 Reporting Concerns

Anyone having knowledge of, or questions or concerns about, an actual or possible violation of the provisions of this Code must immediately report the matter by utilizing one of the below options:

By phone: Continental US dial +1 469-804-8990.

Tekgence Inc strictly prohibits discrimination or retaliation in any form against individuals for making good faith reports of their concerns.

### 2.2 Equal Treatment of All

The Company is dedicated to treating those with whom it does business fairly. To that end, the Company will not tolerate unlawful discrimination on the basis of race, color, national origin, religion, sex, sexual orientation, disability, age, genetic information, ancestry, marital status, veteran status, creed, citizenship status, gender identity or expression or other basis protected by applicable law, including, without limitation, United States federal, state and local laws. Moreover, the Company respects internationally recognized human rights, including the Universal Declaration of Human Rights in all company activities<sup>3</sup>.

Anyone with questions, issues, or suggestions concerning this policy should use the reporting mechanisms outlined above.

### 2.3 Security Obligations

Everyone has a right to work in an environment that is safe, secure, and free of violence. Third Parties have an obligation to work with the Company to achieve this goal by supporting applicable access control practices, escorting visitors as required/appropriate, and reporting unauthorized or suspicious activity. Certain of the Company's customers and subsidiaries have more detailed security policies and procedures, which all are obligated to understand and follow when performing work for such customers and subsidiaries.

### 2.4 Policy Against Harassment

The Company is committed to providing a productive and professional environment. Accordingly, unlawful harassment that is based on race, color, national origin, religion, sex, sexual orientation, disability, age, genetic information, ancestry, marital status, veteran status, creed, citizenship status, gender identity or expression or other basis protected by federal, state, local, or other applicable laws, will not be tolerated by the Company. Similarly, sexual harassment occurring in the workplace or other Company-related settings will not be tolerated. Everyone is responsible for treating one another with dignity and respect and ensuring that their personal conduct and comments in the workplace support a professional environment that is free from unlawful harassment.

Any incident of harassment should be reported using the reporting mechanisms outlined above. It is a violation of this policy to retaliate against anyone for filing a good faith complaint of harassment or for cooperating in good faith in an investigation of such a complaint

## 2.5 Drugs and Alcohol

It is the intent of the Company to maintain a workplace that is free of illegal drugs and alcohol and to discourage drug and alcohol abuse. The Company specifically prohibits the following acts while in an Tekgence Inc facility, a client facility or on Company business:

- The unauthorized use, possession, purchase, sale, manufacture, distribution, transportation, or dispensing of alcohol, illegal drugs, or other controlled substances;
- The purchase, sale, manufacture, distribution, transportation, or dispensing of any legal prescription drug in a manner inconsistent with law;
- Being under the influence of illegal drugs;
- Being under the influence of alcohol while providing services. In certain limited instances, such as at Tekgence Inc sponsored events or during a business-related dinner, moderate use of alcohol may be permitted, but in all such instances proper business decorum must be maintained; or
- Working while impaired by the use of a legal drug whenever such impairment might endanger the safety of someone, pose a risk of significant damage to Company property, or substantially interfere with the performance of services.

In certain instances, such as when working in a safety-sensitive position in conjunction with providing services to Tekgence Inc, Third Parties may be requested to take a drug test, to the extent permitted by applicable law. In addition, Third Parties may be required to submit to drug and alcohol testing, to the extent permitted by applicable law, before being permitted to perform services on certain customers' projects, at the customers' request.

## 2.6 Global Workplace Health and Safety

It is the Company's policy to conduct its business in a manner compliant with applicable health and safety laws and regulations. The Company is committed to continuous efforts to identify and eliminate or manage safety risks associated with our activities.

## 3 Conflicts of Interest

### 3.1 Activities Outside the Company

Generally, the Company has no interest in preventing Third Parties from engaging in lawful activities during non-working hours. However, Third Parties must make sure their outside activities do not conflict or interfere with their responsibilities to provide services to the Company. A conflict of interest occurs or may occur when a personal interest interferes, or potentially interferes, with the interests of the Company. If a Third Party has a question about a potential conflict of interest, the Third Party should discuss it with their company contact or utilize the reporting mechanisms outlined above.

## 4 Technology Use and Privacy

### 4.1 Information Security and Data Privacy

The Company has an Information Security and Data Privacy Policy (“IT Data Privacy Policy”) applicable to all, which prescribes how Personal Information and Personal Health Information (as defined in the IT Information and Data Privacy Policy) of Company Employees, Third Parties and clients should be protected and handled. It is the Company’s policy to treat Personal Information and Personal Health Information of Company Employees, Third Parties and clients as confidential.

Such Personal Information and Personal Health Information should be accessed only by those Third Parties authorized to do so in the course of their services, and transmitted and disposed of in accordance with the IT Information and Data Privacy Policy.

### 4.2 No Expectation of Privacy; Company Right of Access to Technology Resources

As a general rule, and to the fullest extent permitted by applicable law, Third Parties should understand they have no right of privacy with respect to any messages or information created, maintained, or sent on the Company’s Technology Resources, including personal information or messages. Tekgence Inc reserves all rights, to the fullest extent permitted by law, to inspect the Company’s facilities, property, records and systems, including without limitation all messages sent and received and all data and information stored on the Company’s Technology Resources, including the Company’s e-mail system, voicemail system, and computer systems, regardless of the content. The best way to guarantee the privacy of personal information is to not store or transmit it on the Company’s Technology Resources.

Consistent with applicable law, the Company may routinely monitor or examine Third Parties use of its Technology Resources. The Company further reserves, to the fullest extent allowed by law, the right to access, retrieve, review, intercept, read and disclose any information stored or made available on any of its Technology Resources, including Third Party and Company computer files, electronic mail, voicemail, and usage information, at any time, at the Company’s sole discretion. The Company also reserves to the fullest extent allowed by law the right to monitor its Technology Resources at any time in order to determine compliance with its policies, for purposes of legal proceedings, to investigate misconduct, to locate information, or for any other business purpose.



### **4.3 Prohibition Against Harassing, Discriminatory, Threatening, and Defamatory Use of Electronic Communication**

Under no circumstances may a Third Party use the Company's Technology Resources to transmit, request and receive, or store any information that is discriminatory, harassing, threatening, indecent, or defamatory in any way, or that, in any way, violates the Company's policy against discrimination or harassment

### **4.4 Prohibition Against Violating Copyright Laws**

Third Parties may not use the Company's Technology Resources to copy, retrieve, forward, or send copyrighted materials unless the Third Party has the author's permission or is accessing a single copy only for the Third Party's reference. The downloading of software, tools, or other copyright protected material from the Internet without prior, written approval from the Company's Chief Information Officer or the Chief Information Officer's designee is prohibited. Impermissibly downloading material in violation of applicable copyright laws may lead to the cessation of services. The Company reserves its rights to hold the Third Party personally accountable for any resulting liability or damage to the extent permitted by applicable law.

### **4.5 Other Prohibited Uses**

Third Parties may not use any of the Company's Technology Resources for any illegal purpose, in violation of any Company policy, in a manner contrary to the best interests of the Company, in any way that discloses Confidential Information of the Company, in a manner that creates security risks (such as downloading or using software or hardware whose primary purpose is testing or exploiting Technology Resources), or any others for personal or pecuniary gain.

### **4.6 Passwords**

Third Parties who use a computer or other Company-provided Technology Resource must create and then safeguard a strong password, to protect Company Resources from improper access or use by others. Third Parties are responsible for all activities occurring under their user ID.

### **4.7 The Internet and Online Services**

The Company may provide authorized Third Parties access to online services such as the Internet. As noted earlier, the Company expects that Third Parties will use these services in a responsible way and for business-related purposes. Unless expressly permitted by applicable law, Third Parties who are provided such access are at all times prohibited from using the Company's Technology Resources to access, download, or contribute to the following:

- Gross, indecent, or sexually oriented materials;
- Illegal drug-oriented sites;
- Gambling and game sites;
- Malicious or potentially harmful content, code, or applications; or
- Job-search sites (other than in connection with Company business).

## 4.8 Software Use License Restrictions

All software in use on the Company's Technology Resources is officially licensed software. No software is to be installed or used that has not been duly paid for and licensed appropriately for the use to which it is being put. No Third Party may load any software on the Company's computers, by any means of transmission, unless authorized in advance by the Company's Chief Information Officer.

## 4.9 Confidential Information

The Company is very sensitive to the protection of trade secrets and other confidential and proprietary information of both the Company and third parties, including suppliers and customers (together "Confidential Information"). In conjunction with providing services Tekgence Inc, Third Parties are expected to use good judgment and to adhere to the highest ethical and legal standards when using or transmitting Confidential Information, whether on the Company's, a customer's, or another party's Technology Resources.

Examples of Confidential Information include, but are not limited to, non-public information, (whether written or oral) pertaining to: trade secrets; methodologies; presentations, marketing and sales plans and forecasts, discoveries, ideas and know-how; business and strategic plans; pricing information and rate structures; merger and acquisition activity; financial plans and forecasts; plans for new service offerings and products; customer lists; customer proposals; phone lists, organization charts and e-mail lists; and the personal information or personal health information (as defined by the Company's Information Security Policies or applicable law) of Company Employees or Third Parties, suppliers and customers.

Unauthorized copying, use, disclosure or circulation of Confidential Information is strictly prohibited. Confidential Information may only be used within the ordinary course of the provision of services to the Company. Confidential Information should not be accessed through the Company's Technology Resources in the presence of unauthorized individuals. Similarly, Confidential Information should not be left visible or unattended. Third Parties should use caution when sending Confidential Information over the Internet. Third Parties also should verify electronic mail addresses or facsimile numbers before transmitting any messages or Confidential Information.

Any Confidential Information transmitted via the Company's Technology Resources should be marked with a confidentiality legend. Any Confidential Information that constitutes personal information or personal health information (as defined by the Company's IT DATA Privacy Policy or applicable law) of Employees, or third parties must be handled, stored, transmitted, and destroyed in accordance with applicable law and the Company's IT Data Privacy Policy and its Information Security Policies.

## 5 Gifts, Gratuities, Entertainment and Other Considerations

### 5.1 Gifts and Entertainment Rules with Respect to Government Officials and Employees

The laws and rules concerning doing business with governments and their officials and employees are complex and very restrictive. Many countries have laws that significantly limit or prohibit the ability of government officials and government employees to give or accept gifts or business entertainment or meals.

With this in mind, Third Parties may not in conjunction with delivering services to Tekgence Inc give or offer to give to any government employees or officials who are prohibited from accepting such consideration any entertainment, meal, travel, gift, or other item of value.

### 5.2 Bribes and Kickbacks

Paying, or offering to pay, a bribe or a kickback to anyone, for any reason, by any means, in conjunction with providing services to Tekgence Inc is strictly prohibited. Likewise, Third Parties may not solicit, agree to receive or accept a kickback or bribe, in any form, for any reason, in conjunction with delivering services to Tekgence Inc.

This is not limited to cash or other monetary payments. It includes any financial or other advantage. A “financial or other advantage” includes, but is not limited to, money, favors, entertainment, or gifts.

For more information on this topic, please see the Global Anti-Corruption and Bribery Policy.

## 6 Business Relationships

### 6.1 Customer Relationships

The Company's customers are of the utmost importance to the Company. Third Parties should always treat customers and potential customers ethically and according to the highest standards of business conduct.

It is the Company's policy to always sell its products and services on their merits and to avoid making disparaging comments about the products and services of competitors. Third Parties should refrain from commenting upon the character, financial condition, or potential legal or regulatory problems of the Company's competitors.

### 6.2 Privacy of Customer Communications

The Company's customers trust us with one of their most important assets — information. We must honor this trust by protecting the privacy of customer communications, whether the communication is in electronic, voice, written, or other form.

The Company has established the following guidelines to protect privacy of customer communications:

- Do not eavesdrop on, record, or divulge the contents of any customer conversation, electronic message, document, or other transmission. Never let anyone else do so.
- Do not divulge to any other individual, except an authorized Employee or Third Party requiring the information for a legitimate business reason, any information about the customer's (or their customers') communications, identity, or other business information or records.
- Do not use any customer information from any non-public source for personal benefit or that of anyone else. □ Do not access customer records or information in any system, for any reason, except for official Company business

### 6.3 Working with Existing Suppliers

Third Parties should comply with the following rules when working with existing suppliers, which includes companies that are not within the Tekgence Inc family:

- Never interfere with a supplier's contracts or business relations with a competitor of the Company.
- Never reveal Confidential Information about one supplier to another supplier or to anyone outside of the Company. This includes confidential or non-public information about services or products supplied, pricing, service level assurances, purchase volumes, and other terms and conditions.

## 7 Doing Business Globally

### 7.1 No Payments to Low-Level Non-US Governmental Employers and Officials

The Company is committed to the highest business conduct standards wherever it operates. The Company observes these standards worldwide, even at the risk of losing business. While no one can anticipate all the situations that may present challenges to doing business in the worldwide marketplace, the following guidelines always apply to Third Parties in conjunction with providing services to Tekgence Inc:

- Observe all laws and regulations, both U.S. and non-U.S., that apply to our business abroad.
- Paying bribes to government officials or to their immediate family members is absolutely prohibited, even if those bribes are common practice. Third Parties may not give, promise to give, or authorize giving to a foreign official, a foreign political party, an official of a foreign political party, a candidate for foreign political office, or to any international organization, any money, gift, or anything of value to:
  - (1) influence their acts or decisions;
  - (2) induce them to do or omit to do any act in violation of their lawful duty; or
  - (3) induce them to use influence with a foreign government or agency.
- Paying bribes anywhere in the world (whether the third party is a public official, a private individual or an incorporated or unincorporated organization) is absolutely prohibited. □ Do not cooperate with illegal boycotts.
- Observe all licensing requirements and the requirements of applicable import and export control laws, as well as all laws and regulations pertaining to privacy and data transfer.

## 8 The Government Securities Law and the Media

### 8.1 Inside Information and the Laws Against Insider Trading

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  - (1) influence their acts or decisions;
  - (2) induce them to do or omit to do any act in violation of their lawful duty; or
  - (3) induce them to use influence with a foreign government or agency.
- Paying bribes anywhere in the world (whether the third party is a public official, a private individual or an incorporated or unincorporated organization) is absolutely prohibited. □ Do not cooperate with illegal boycotts.
- Observe all licensing requirements and the requirements of applicable import and export control laws, as well as all laws and regulations pertaining to privacy and data transfer.

## 9 Accuracy of Reports

The Company complies with all applicable reporting requirements and regulations wherever the Company does business. Third Parties are responsible for the accuracy of the records, time sheets, and reports they work on, submit, or approve in conjunction with providing services to Tekgence Inc. Accurate information is essential to the Company's ability to meet legal and regulatory obligations and to compete effectively. The records and books of account of the Company shall meet the highest standards and accurately reflect the true nature of the transactions they record.

In conjunction with providing services to Tekgence Inc, Third Parties may not create any false or misleading documents or accounting, financial, or electronic records for any purpose. For example, expense reports must accurately document expenses actually incurred. Third Parties must not obtain or create "false" invoices or other misleading documents or records, or invent or use fictitious entities, sales, purchases, timesheets, services, or other financial arrangements for any purpose.

If there are any questions, or if a Third Party feels they are being asked to create a document or an electronic record in a less than complete, honest, and accurate manner, the Third Party must immediately report such as detailed in Section 2.1.

## 10 Concerns Regarding Accounting, Auditing, Fraud, Money Laundering, or Internal Control Matters

The financial statements of the Company shall conform to generally accepted accounting principles and the Company's accounting policies.

The Company is committed to and requires strict conformance to the taxing and other financial reporting requirements of all jurisdictions where it does business. The Company likewise takes seriously its obligation to minimize the risk of fraud and other financial misconduct, including money laundering.

Anyone with concerns or complaints regarding accounting, internal controls, fraud, financial misconduct, money laundering or auditing matters may confidentially submit such concerns or complaints by the means outlined in Section 2.1. Any such concerns also may be reported anonymously where permitted by local law.

The Company will not take any adverse action against or retaliate against anyone who reports a complaint or concern (unless the individual is found to have knowingly and willfully made a false report).



## 11 Compliance and Reporting

### 11.1 Investigations

The financial statements of the Company shall conform to generally accepted accounting principles and the Company's accounting policies.

The Company is committed to and requires strict conformance to the taxing and other financial reporting requirements of all jurisdictions where it does business. The Company likewise takes seriously its obligation to minimize the risk of fraud and other financial misconduct, including money laundering.

Anyone with concerns or complaints regarding accounting, internal controls, fraud, financial misconduct, money laundering or auditing matters may confidentially submit such concerns or complaints by the means outlined in Section 2.1. Any such concerns also may be reported anonymously where permitted by local law.

The Company will not take any adverse action against or retaliate against anyone who reports a complaint or concern (unless the individual is found to have knowingly and willfully made a false report).

## 12 Summary

Any Third Party who violates the provisions of this Code will be subject to review and the potential termination of services.

In addition, anyone who retaliates against someone for reporting a potential violation in good faith, or for participating in an investigation in good faith, may face consequences which may include termination.