



# Code of Business Conduct & Ethics

## Policy Statement

The following Code of Business Conduct and Ethics (Code) is the foundation of our commitment to act with integrity and in compliance with the laws and regulations that apply to our worldwide operations. It is designed to assist you in recognizing and dealing with ethical issues and guide you to the right course of action.

While the Code sets forth general guidelines of business practices and procedures, it does not purport to capture every law or policy that applies to each of us. We are responsible for knowing the laws and regulations of the jurisdictions in which we operate and for understanding the basic principles of the Code and conducting ourselves accordingly.

## Company Values

A company's values and the beliefs, philosophies and principles that drive a business are a critical part of every high-performing organization. Our values – Delighting Customers; Innovation; Sustainability; Integrity; One Team – guide each of us when tackling a new opportunity, challenge, task or issue.



### Delighting Customers

Why? Our customers are why we exist, and the value we provide is why they trust us. That's why we will always try to exceed expectations and delight our customers with service and partnership.



### Innovation

Why? We believe that innovative change is a positive force and that the status quo breeds malaise. That's why technology and digital innovation is in our DNA, and why we will always look for new ways to do old things better.



### Sustainability

Why? We believe everyone and every business must play a part for a sustainable future. That's why we want to be at the beating heart of a circular world where products and parts are re-used, waste and emissions minimised, and business sense prevails.



### Integrity

Why? We honour our commitments, and help our customers honour theirs too. We treat everyone with respect and always speak honestly and openly. We are accountable for our actions and will always choose the ethical path.



### One Team

Why? OnProcess is the collective sum of its people, customers, and partners. We will go out of our way to support and include each other and the broader community, inside and out of work, and always acting as #oneteam.

This Code underpins our Company values and expresses what we believe and what we all commit to do to achieve those values.

## Applicability

All employees, officers, directors or agents of OnProcess Technology, Inc. (Company) and/or its subsidiaries and any other person or entity acting on behalf of the Companies (collectively referred to as “employees” in this Code), must know and comply with all of the Company policies and requirements as it relates to your job. We are subject to the laws and regulations of all the countries in which we operate, and each of us has a responsibility to know and follow the local laws that apply.

## Policy Specifics

### Respect for the Individual, Diversity and Equal Opportunity

We are committed to creating and fostering a work environment where we are all treated with dignity and respect, and which cultivates a strong, diverse team. The Company is an equal employment/affirmative action employer and is dedicated to providing a workplace that is free of discrimination of all types and from abusive, offensive or harassing behavior.

All Company employees are also expected to support an inclusive workplace. The Company will not tolerate discrimination, harassment or any behavior or language that is abusive, offensive or unwelcome.

### Compliance with Laws and Regulations

As an international company with relationships in many countries around the world, the Company is committed to maintaining high standards of business conduct in all regions in which the Company operates. We expect all Employees to conduct our business in accordance with applicable laws, rules and regulations, as well as other applicable Company policies (e.g., the Company’s Anti-Bribery and Corruption Policy) and in an ethical manner.

### Conflicts of Interest

We must avoid any relationship or activity that might impair, or even appear to impair, our ability to make objective and fair decisions when performing our jobs. At times, we may be faced with situations where the business actions we take on behalf of the Company may conflict with our own personal or family interests. We owe a duty to the Company to advance its legitimate interests when the opportunity to do so arises. We must never use Company property or information for personal gain or personally take for ourselves any opportunity that is discovered through our position with the Company.

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. Before engaging in any activity, transaction or relationship that might give rise to a conflict of interest, employees must seek review from their managers or the HR department.

## **Gifts, Gratuities and Business Courtesies**

The Company is committed to competing solely on the merit of our products and services. We will neither give nor accept business courtesies that constitute, or could reasonably be perceived as constituting, unfair business inducements that would violate law, regulation or Company policies (e.g., the Company's Anti-Bribery and Corruption Policy), or would cause embarrassment or reflect negatively on the Company's reputation.

## **Political Contributions**

No employee may make any political contribution of any kind in the name of the Company or by utilizing Company funds, assets, services or facilities. Furthermore, you cannot require, nor should you request, a supplier or vendor of the Company to make a political contribution of any kind as a condition of doing business with the Company. As an employee, you are free to make a personal political contribution or engage in personal political activities so long as such contributions or activities are lawful, do not interfere with your work responsibilities or give the appearance of a conflict of interest.

## **Confidential and Proprietary Information**

Integral to the Company's business success is our protection of confidential company information, as well as nonpublic information entrusted to us by employees, customers and other business partners. Confidential and proprietary information includes such things as pricing and financial data, customer names/addresses or nonpublic information about other companies, including current or potential suppliers and vendors. We will not disclose confidential and nonpublic information without a valid business purpose and proper authorization.

## **Protection and Use of Company Resources**

You have an obligation to protect the Company's assets and ensure their efficient use. Company assets should be used for legitimate business purposes although reasonable personal use may be permitted. Company assets include both tangible assets, such as office equipment, telephone and copy machines, and intangible assets, such as intellectual property, trademarks, patents and trade secrets. Employees are provided with computers, electronic resources and other equipment to do their jobs. Company electronic and computing resources should primarily be used for Company purposes. Equipment such as computers and other electronic media must not be used for unlawful purposes or for accessing or distributing pornographic or illegal materials or other materials that might create a hostile work environment for others.

## **Corporate Recordkeeping**

We create, retain and dispose of Company records as part of our normal course of business in compliance with all Company policies and guidelines, as well as all regulatory and legal requirements.

All corporate records must be true, accurate and complete, and company data must be promptly and accurately entered in our books in accordance with Company and other applicable accounting principles.

We all are responsible for ensuring accurate and complete business and financial records. No transaction may be carried out in a manner such that the substance of the transaction is obscured or recorded improperly. for ensuring accurate and complete business and financial records. No transaction may be carried out in a manner such that the substance of the transaction is obscured or recorded improperly.

## Health and Safety

The Company strives to provide each employee with a safe and healthy work environment. Each employee is responsible for maintaining a safe and healthy workplace for all employees by following health and safety rules and practices and reporting accidents, injuries and unsafe equipment, practices or conditions.

## Environmental Sustainability

The Company acknowledges that our decisions about what we consume, produce and waste has environmental and social impacts on today's society, as well as on future generations. The Company's sustainability initiatives center around finding better and smarter ways of doing things, while ensuring the health and vitality of our communities.

The Company is committed to complying with all applicable environmental legal requirements and protecting the environment. Employees are also expected to comply with all applicable environmental legal requirements and report any incidents or conditions that might result in a violation of law or Company policy. Employees are also encouraged to support environmental programs in communities where we do business.

## Reporting

All employees have an obligation to report any potential or suspected violation of the Code. The Company does not tolerate retaliation against any employee who reports a complaint in good faith. Any employee who retaliates against someone who has reported a complaint in good faith, or made a statement in good faith in a complaint investigation process, is subject to disciplinary action up to and including termination of employment.