



CODE OF BUSINESS CONDUCT AND ETHICS

GENERAL POLICY

It is the policy of the Eviosys family of companies (the “Company”) that every employee (whether permanent or temporary) and all representatives acting on behalf of the Company (including Business Partners) shall at all times and in all ways respect and obey both the letter and the spirit of applicable laws, rules and regulations and that every employee shall strive to adhere to the highest standards of ethics, morality, honesty and decency in the performance of the duties of his or her job.

SPECIFIC POLICIES

To ensure that every employee adheres to the General Policy, the Company has adopted several specific policies, set forth below. Although the specific policies do not cover every conceivable situation an employee may face, they address certain issues that may arise. If any employee has any questions about whether certain conduct is lawful or otherwise meets Company standards, that employee should immediately ask his or her supervisor, plant manager or the Legal Department. Unless otherwise noted, the specific policies and references to Company “employees” apply to each employee (whether permanent or temporary) and representative (including Business Partners) of the Company and its subsidiaries. The Company will implement the specific policies in a manner consistent with the applicable laws, rules and regulations in the jurisdictions in which the Company conducts business.

POLICY ON CONFLICTS OF INTEREST AND CORPORATE OPPORTUNITIES

It is the Company’s policy to prohibit conflicts of interest, except as pre-approved in writing by the Management Committee of the Company. A “conflict of interest” occurs when an individual’s private interest potentially interferes with the interests of the Company or can give rise to perceptions of impropriety and concerns around the integrity of decision-making. A conflict situation can arise when an employee takes actions or has interests that may make it difficult to perform his or her work for the Company objectively and effectively; for example, if he or she has a role in an organization that does business with or competes against the Company. Conflicts of interest also arise when any employee or a member of his or her family, receives improper personal benefits as a result of his or her position in the company. Any employee who has a question regarding an actual, potential or perceived conflict of interest should consult with the Legal Department.



Corporate Opportunities

Company employees owe a duty to advance the Company's legitimate interests when the opportunity to do so arises and are prohibited from:

- taking for themselves (or any third party) business opportunities that are discovered through the use of the Company's corporate property or information, or the employee's position with the Company;
- using the Company's property or information, or the employee's position with the Company, for personal gain or for the gain of any third party; and
- competing with the Company.

Protection and Use of Company Assets

Company employees should endeavor to protect the Company's assets and ensure their efficient use. Theft, carelessness and waste have a direct impact on profitability. Company property, including computers, electronic information and e-mail and other communication systems and files, are only to be used for appropriate business purposes and for use, access and activities approved by the employee's supervisor.

POLICY ON DEALINGS ABROAD

As a company with global operations, the Company is subject to the laws and regulations of the jurisdictions in which we operate. Among other areas, these laws cover economic and trade sanctions, antiboycott, and export controls.

Sanctions

The Company must comply with applicable economic and trade sanctions programs and laws. For example, authorities in the EU and UK, and also the U.S. Office of Foreign Assets Control, maintain restrictions and prohibitions on conducting business with or providing services to certain countries, entities and individuals. Any business dealings or proposed business opportunities with any nexus to Iran, Crimea, Syria, North Korea or Cuba must be immediately escalated to the Legal Department for further review.



Antiboycott

The Company must comply with applicable antiboycott laws. A boycott occurs when a person or group of people refuse to do business with certain other people or countries. For example, U.S. antiboycott laws generally prohibit U.S. companies and their worldwide subsidiaries from cooperating with international boycotts that the U.S. government does not sanction. Similarly, German antiboycott laws generally prohibit German companies and companies operating in Germany from cooperating with international boycotts that the German government does not sanction.

Export Control Laws

The Company must comply with all applicable national and multinational export control laws. For example, EU and UK export control laws apply to the export of certain controlled goods, software and technology, or where there are concerns about the end-use of an item being exported. Export controls can apply in respect of both raw materials and also finished products, and can also apply to intra-group transfers between Eviosys entities.

Any Company employee who has a question regarding the applicability of sanctions, antiboycott or export control laws should consult with the Legal Department.

ANTI-CORRUPTION POLICY

No Company employee, or third party acting on behalf of the Company may pay, offer or promise to pay, or authorize payment to any party, public or private, in any country, in order to secure an improper benefit for the Company, nor may they accept or solicit such payment. “Payment” includes making bribes or kickbacks, as well as conferring anything of value, whether tangible or intangible (*e.g.*, gifts, entertainment, travel expenses, charitable donations, political contributions, hiring an individual or relative, or making a facilitation payment).

Gifts, Donations, Entertainment and Favors

The Company recognizes that the occasional exchange of business courtesies, such as modest gifts, meals and entertainment can be a common practice meant to create goodwill and establish trust in business relationships. Therefore, this policy is not intended to preclude the giving or acceptance of such common courtesies, provided that the value of the gratuity is nominal in relation to the circumstances in which it is offered and accepted or in accordance with generally accepted business practices of the country and industry and is not intended to influence the business decisions of the person involved. Employees should avoid any conduct that even creates an impression of impropriety. An employee who is offered or receives a gift of a nature that would contravene this policy should politely decline or return the gift and report it to the Legal



Department.

No Company employee may give or accept anything of greater than nominal value to or from any current or prospective customers, suppliers, vendors, public or political party officials or any other persons. The giving or acceptance of cash gifts (including cash equivalents such as stocks or bonds), personal loans, discounts or any other gift or favor that could be considered a bribe or a kickback or other illegal or unethical payment, or which could otherwise raise concerns around impropriety, is strictly prohibited regardless of value. In addition, Company employees may not solicit gifts, gratuities or meal or entertainment invitations or other hospitality from anyone with whom the Company does, or is negotiating to do, business.

This policy is intended to apply to all Company employees, and any members of their immediate families, as well as third parties acting on behalf of the Company, including third-party agents, distributors, consultants, contractors and lobbyists and joint venture partners. Please refer to the Company's Anti-corruption policy for further details and examples of potential issues. If there are any questions about the application of this policy, contact the Legal Department.

ANTITRUST AND COMPETITION LAW POLICY

The Company competes vigorously, fairly and independently for business in every ethical way in every area of every market. The antitrust and competition laws of the countries in which the Company does business are the foundation of competitive free enterprise.

The Company requires that all employees fully comply with the antitrust and competition laws of the countries in which we do business. It is illegal in the EU and many other countries to enter into agreements, understandings or discussions with any of our competitors concerning: prices or discounts; terms of conditions of sale, including credit terms; profits, profit margins or costs; employee compensation or recruiting; division of the market; bids or the intent to bid; capacity expansion or entering new markets; selection, rejection or termination of customers or classes of customers; sales territories or markets; exchange of competitive information; or any other matter inconsistent with complete freedom of action and independence of the company in the conduct of its business.

Further information on the Company's approach to antitrust and competition law compliance is set out in the "Eviosys Competition Law Compliance Policy". Please consult your Legal Department for further information on this.

Please consult your manager or the Legal Department before extending different discounts, rebates, allowances or other price adjustments or different terms or conditions of sale to different customers for the same product or if you have any questions or concerns, or any time you need assistance in understanding or complying with this policy.



ENVIRONMENT, HEALTH & SAFETY POLICY

The Company recognizes that the protection of human health and the environment is a sound business practice that conserves resources and safeguards employees, customers, the general public and the environment. Each Company employee shares this responsibility to ensure the Company's long-term success.

To implement the policy, the Company and its employees will:

- Commit to operating the Company's businesses in conformance with all regulatory requirements and the Company's environmental, health and safety standards and policies.
- Strengthen the Company's proactive environmental, health and safety culture by increasing awareness and knowledge among all levels of employees and commit to the protection and well-being of each employee.
- Promote pollution prevention with an emphasis on source reduction and resource conservation and include environmental, health and safety considerations among the criteria by which projects, products, processes and purchases are evaluated.
- Require each employee to take responsibility for the environmental matters of the Company and the, health and safety performance and security of themselves and fellow employees.
- Assess environmental, health and safety performance and programs and commit to continuous improvement towards target goals of zero accidents and minimum environmental impacts.



POLICY ON TRADE SECRETS AND CONFIDENTIAL INFORMATION

Business Information

Company employees deal on a daily basis with information about our business. This information includes business plans, manufacturing processes and technology, marketing and pricing information, research and development, customer lists and plans for new businesses and ventures. The Company's business could be damaged if this information were disclosed to competitors or to anyone else outside the Company.

Each Company employee should assume that all such information is confidential (except in those circumstances where the Company has disclosed the information in published reports or where the employee can otherwise verify that the information is publicly known and this publication is not due to an unauthorized disclosure). Similarly, each Company employee should assume that all information disclosed to the Company by its customers and suppliers is confidential (except in those circumstances where the customer or supplier has explicitly consented to its disclosure or the employee can otherwise verify that the information is publicly known and this publication is not due to an unauthorized disclosure). Each Company employee is obligated, during and after his or her employment, to hold all such confidential information in confidence, to refrain from disclosing any such information to any person outside the Company without prior consent, and to refrain from using such information for any purpose other than the performance of his or her duties to the Company, except where disclosure is required pursuant to applicable law. Nothing in this policy or any other agreement with the Company regarding confidentiality matters shall prevent any Company employee from reporting violations to governmental authorities, or making other disclosures, that are protected under the whistleblower provisions of applicable law.

Personal Information

Personal data shall be collected and maintained in a confidential way that ensures that the data is accessible only in accordance with applicable law and only to those individuals with a legitimate business need to know the data. All employees will be expected to comply with the Company's Data Privacy policies.

POLICY ON FAIR TREATMENT OF PEOPLE

Equal Opportunity, Discrimination, and Harassment

All employees have the right to be treated with respect and dignity, and thus to work in an environment free from all forms of unlawful employment discrimination, including sexual



harassment and harassment based on race, color, national origin, ancestry, nationality, citizenship, religion, age, sex, gender, sexual orientation, gender identity or expression, physical or mental disability, genetic information, uniformed service, veteran's status or any other characteristic protected by applicable law, ordinance or regulation. It is, therefore, Company policy that unlawful discrimination, including harassment in any of these forms, of employees by their supervisors, co-workers, vendors or customers is strictly prohibited. Such conduct is not tolerated and should be reported promptly as outlined in this Code of Business Conduct and Ethics. It is also the Company's policy not to discriminate against any applicant for employment on any of the bases described above.

There is no definitive definition of what may constitute harassment. However, as an example, harassment will include verbal or physical conduct that denigrates or shows hostility or aversion toward an individual for any of the reasons listed above and that:

- has the purpose or effect of creating an intimidating, hostile or offensive work environment;
- has the purpose or effect of unreasonably interfering with an individual's work performance; or
- otherwise adversely affects an individual's employment opportunities.

Some examples of such harassment are: using epithets, slurs or negative stereotypes; threatening, intimidating or engaging in hostile acts that relate to a protected characteristic; purported jokes or pranks; placing on walls, bulletin boards or elsewhere on company premises (or circulating in the workplace via any media) oral, written or graphic material that denigrates or shows hostility or aversion toward a person or group because of a protected characteristic; unwanted physical contact, and with respect to sexual harassment, the conditioning of any terms and conditions of employment upon the performance of sexual acts or favors.

Any report of discrimination or harassment will be investigated and prompt, remedial action will be taken to end any substantiated discrimination or harassment.

Respecting Human Rights

It is the Company's policy to conduct business in a manner that respects the human rights and dignity of all, and the Company supports international efforts to promote and protect human rights. The Company will not tolerate abuse of human rights in its operations or in its supply chain and is committed to eliminating abuses such as child labor, slavery, human trafficking, and forced labor.



POLICY ON FAIR DEALING AND TRUTH IN REPORTS AND RECORDS

Company employees should endeavor to deal fairly with each other and with customers, suppliers, and competitors. Company employees are prohibited from taking unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair-dealing practice.

Company employees shall not knowingly create, maintain or submit records, reports or statements that are inaccurate, false or misleading. All Company employees have an affirmative duty to ensure that any statement or representation made on the Company's behalf is truthful and accurate. While this policy applies to all communications made in the Company's name, it is especially critical with regard to any statement, letter or document that is directed to, or may be relied upon by, any governmental agency.

Falsification in records, submissions or statements is a type of conduct that is extremely likely to give rise to violations of the law, as well as the appearance of impropriety. Individuals who, on behalf of the Company, fill out or who are responsible for or who make statements to governmental or regulatory agencies must exercise care to ensure that such records or statements are accurate. In this regard, it is always preferable to be truthful and to admit ignorance when that is the case rather than to speculate. Similarly, Company employees should always check facts to be certain they are accurate rather than providing information or reports to governmental or regulatory agencies based on guesses or assumptions.

POLICY ON FINANCIAL REPORTING

Company management, including all employees with financial reporting responsibilities, shall:

- engage in and promote honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships;
- promote full, fair, accurate, timely and understandable disclosure in reports and documents that the Company files with, or submits to, any government and in other public communications;
- comply with applicable laws, rules and regulations;
- promptly report any violation of this Code of Business Conduct and Ethics to the Legal Department or any of the contacts listed herein; and
- be held accountable for their adherence to the above



POLICY ON PUBLIC AFFAIRS

Public Communications

Only authorized personnel are permitted to speak on behalf of the company through public communications, including the media. Employees without express authority to speak on behalf of the Company who are contacted by the media or by members of the investment community must refer such contacts to the Legal Department or the Chief Financial Officer.

Unless authorized to do so, Company employees must never give the impression that they are speaking on behalf of the Company in any communication that may become public, including social media. Company employees must use good judgment when using social media, including expressing ideas and opinions in a respectful manner. Ultimately, each Company employee is solely responsible for what they post online. If a Company employee sees something online that could be potentially harmful to the Company, they should report it immediately to the Legal Department.

Political Contributions

Company employees are encouraged to become involved in civic affairs and political activities as private citizens. However, when employees become involved in such matters, they must do so strictly as a private individual, not as a representative of the Company. Company employees may not use their position at the Company to support their personal political activities. Under no circumstances may Company corporate funds be unlawfully used for political contributions of any sort.

EMPLOYEES' DUTIES

All Company employees, from executive management to plant management to hourly and part time employees, are required to follow the policies set forth in this Code of Business Conduct and Ethics. Further, all Company employees must obey all applicable laws, rules and regulations at all times, regardless of what local or industry practice may be in any given area. Any failure to follow these policies can result in discipline, up to and including discharge.

Any Company employee who has questions about whether a particular action he or she is contemplating, or a situation he or she is involved with, might be inconsistent with company policy or might be improper for any other reason, should raise the question with his or her supervisor, the plant manager or the Compliance Office and get it resolved before taking the action or allowing



the situation to continue.

COMPLIANCE AND REPORTING PROCEDURES

Employees will be periodically required to submit a signed verification to certify to continuing understanding of and compliance with this Code of Business Conduct and Ethics. Any employee or representative who becomes aware of any violation is strongly encouraged to immediately report the violation. Violations can be reported to the Compliance Officer or the Legal Department, the employee's supervisor, or through the Company reporting helpline.

Any employee who reports a violation will be treated with dignity and respect and will not be subjected to any form of discipline or retaliation for reports made in good faith. Any employee who believes that he or she is being subjected to retaliation as a result of making such a report should report this to the Legal Department. Any person found to have retaliated against or in any way punished another employee for having in good faith reported a violation will be subject to discipline, up to and including discharge.

Compliance Officer

The Company has appointed its Chief Administrative Officer, Laurent Watteaux, as the Compliance Officer. Mr. Watteaux is supported by other members of the Legal Department, including Juliana Castillo.

The Compliance Officer, including personnel that support the Compliance Officer, is responsible for all aspects of compliance, for establishing and revising the policies set forth in this Code of Business Conduct and Ethics, and for the implementation of the procedures designed to achieve these policies.

How to Report Violations

All Company employees and representatives are strongly encouraged to immediately report any violations of the policies set forth in this Code of Business Conduct and Ethics, and in the more specific policies and procedures the Company has adopted to promote compliance. Every employee or representative who knows of or suspects a violation of a policy or compliance procedure has three ways to report it: (1) to the Compliance Officer or the Legal Department, (2) to his or her supervisor, or (3) using the Company's Ethics Reporting Hotline, as follows:



- **Website:** <https://www.lighthouse-services.com/eviosys> [[lighthouse-services.com](https://www.lighthouse-services.com)]
- **Anonymous Reporting App: Keyword: Eviosys**
 - Detailed instructions [here](https://www.lighthouse-services.com) [[lighthouse-services.com](https://www.lighthouse-services.com)]
- **Toll-Free Telephone:**
 - **800-603-2869** (must dial country access code first [click here](https://www.lighthouse-services.com) [[lighthouse-services.com](https://www.lighthouse-services.com)] for access codes and dialing instructions)
- **E-mail:** reports@lighthouse-services.com (must include company name with report)
- **Fax:** +1 (215) 689-3885 (must include company name 'Eviosys' with report)

No Retaliation. Any Company employee who in good faith reports a violation of these policies or procedures may not be subjected to punishment or retribution in any form.