



CompManagement, LLC Vendor Code of Conduct

("Code of Conduct")

This CompManagement Vendor Code of Conduct sets forth the principles and standards of conduct that CompManagement expects vendors/suppliers, their employees, subcontractors and sub-suppliers to meet during the provision of goods and services to the Company. To support compliance with this Code of Conduct, vendors/suppliers shall ensure that the Code of Conduct is shared with all individuals assigned to perform work for or on behalf of CompManagement and/or CompManagement clients, and that all related tasks are executed by individuals with the skills, expertise and certifications necessary to uphold the principles and meet the standards of the Code of Conduct.

1. COMPLIANCE WITH THE VENDOR CODE OF CONDUCT

Vendors, Suppliers, Consultants and their employees, agents and subcontractors (collectively referred to as "Vendors") must adhere to this Code of Conduct while conducting business with or on behalf of CompManagement. Vendors must promptly inform CompManagement via the email address below when any situation develops that causes the Vendor to operate in violation of this Code of Conduct. CompManagement may audit Vendors or inspect Vendors' facilities to confirm compliance. Vendor agrees to participate in any required training offered by CompManagement specific to this Code of Conduct.

2. LEGAL AND REGULATORY COMPLIANCE PRACTICES

Vendors will comply with all applicable local, national and international laws, regulations, treaties and industry standards, including, without limitation, those pertaining to the manufacture, pricing, sale and distribution and safety of the relevant products and/or services. In the event that the requirements of these Standards are stricter than applicable local, national or international law, Vendors will comply with these Standards. However, if there is any conflict between the requirements of these Standards and the requirements of any applicable local, national or international law, Vendor is to comply with the local, national or international law. Vendor will notify CompManagement in writing of any such conflicts.

3. BUSINESS PRACTICES AND ETHICS

CompManagement Vendors must conduct their business interactions and activities with integrity and must, without limitation, address:

Business Integrity

Corruption, extortion, embezzlement, and other questionable/inappropriate business practices, in any form are strictly prohibited. Vendors shall not violate the Foreign Corrupt Practices Act (FCPA), any international anti-corruption conventions, and applicable anti-corruption laws and regulations of the countries in which they operate, and shall not engage in corruption, extortion, or embezzlement in any form. Vendors shall not offer bribes or other means to obtain an undue or improper advantage. Vendor

shall under no circumstances tolerate the giving or receiving of undue reward to influence the behavior of another individual, organization, politician or government body, so as to acquire a commercial advantage; this extends to all operations, regardless of whether bribery is officially tolerated and condoned. Vendors must conduct business in a fair and ethical manner in all aspects of their business.

Gifts and Conflicts of Interest

CompManagement and many of its clients have policies limiting gifts to colleagues. Vendors shall abide by these policies. The CompManagement Gifts policy prohibits CompManagement colleagues from accepting personal gifts, entertainment, or favors of significant value (over \$100), or engaging in private business or professional activities where there is or would appear to be a conflict between the individual's private interests and the interests of CompManagement. Colleagues cannot accept gifts of cash or cash equivalents (e.g., gift cards). CompManagement colleagues must avoid accepting a gift or series of gifts or business courtesies where circumstances might create or appear to create an expectation that the acceptance is in exchange for favorable business decisions. Vendors should avoid situations that appear or actually create a conflict of interest or appearance of impropriety for CompManagement colleagues. For more information, refer to the CompManagement Gifts policy and any applicable CompManagement client policy.

4. LABOR PRACTICES AND HUMAN RIGHTS

CompManagement expects its Vendors to share its commitment to human rights and equal opportunity in the workplace. All CompManagement Vendors must conduct their employment practices in full compliance with all applicable laws and regulations, and must, without limitation:

- Cooperate with CompManagement's commitment to create a culture and a business environment based upon inclusion, mutual respect, responsibility, and understanding. Vendors will not discriminate in hiring and employment practices, including salary, benefits, advancement, discipline, termination or retirement, on the basis of race, religion, age, nationality, social or ethnic origin, sexual orientation, gender, marital status, political opinion, disability, or any other category protected by law. Vendors will treat each employee with dignity and respect, and will not use corporal punishment, threats of violence or other forms of physical, sexual, psychological or verbal harassment, abuse or intimidation.
- Vendors shall not use child labor unless this is part of a government-authorized job training or apprenticeship program that would clearly be beneficial to the persons participating so as long as these programs comply with all applicable laws and regulations.
- At a minimum, Vendors will comply with all applicable wage and hour laws and regulations, including those relating to minimum wages, overtime, maximum hours, piece rates and other elements of compensation, and provide legally mandated benefits.
- Vendors shall not use forced labor, regardless of its form.



5. HEALTH AND SAFETY

CompManagement Vendors are expected to integrate sound health and safety management practices into all aspects of business, and must, without limitation provide a safe working environment that supports accident prevention and minimizes exposure to health risks. Vendors are expected to comply with all applicable safety and health laws and regulations in the countries in which they operate.

Disclosure of Information

Vendors must accurately record and disclose information regarding their business activities, structure, financial situation, and performance in accordance with applicable laws, rules and regulations.

6. REPORTING QUESTIONABLE BEHAVIOR

If you wish to report questionable behavior or a possible violation of this Code of Conduct, you are encouraged to initially work with your primary CompManagement contact in resolving your concern. If that is not possible or appropriate, please contact by sending an email to:

VendorCodeofConduct@compmgt.com

CompManagement will maintain confidentiality to the extent possible and will not tolerate any retribution or retaliation taken against any individual who has, in good faith, sought out advice or reported questionable behavior or a possible violation of this Code of Conduct.