

SOLONTEK CODE OF CONDUCT

SolonTek wants to be a great company, an exceptional company. Our mission is not only to develop innovative security & AI technologies that help make our customer's lives easier and their sensitive data more secure. Our mission goes far beyond that, it reflects who we are as a company. How we work together. How we manage internal operations and processes. How we collaborate and partner with our customers, suppliers, employees, agents, sub-contractors, and Partners.

SolonTek's employees, partners, agents, sub-contractors, suppliers (referred hereinto as "Partner(s)") in partnership with SolonTek, to serve our mutual customers. It is important that SolonTek's Partners strive to have high values and improve on processes within their business units and organizations to promote this.

Whether you are an employee, sub-contractor, agent, partner, alliance, while conducting business with SolonTek's customer's, employees, sub-contractors, agents, suppliers, alliances, SolonTek expects its Partners to commit to operating in full compliance with all applicable laws and regulations, and to adhere to the principles outlined in this Code of Conduct.

SolonTek believes that its success lies on its values. We are committed to ethical and responsible business practices. Our values apply to all SolonTek employees, directors, and officers.

RESPECT – We respect each other and recognize that every person's value is as important as our own. We treat each other with decency, and when we disagree, we do it respectfully.

INTEGRITY - We are honest, ethical, and trustworthy. We are transparent when it does not breach confidentiality. Trust is built when we keep our word, and when we do the right thing. Integrity is when we do the right thing when it is hard, when we are under stress, and when no one is looking.

ACCOUNTABLE – We are accountable for our actions and the results thereof.

When we own the outcomes of our decision-making, it helps others view us as credible. We are not afraid to make mistakes and fail, but we try to fail fast. We invite the input of others.

Anyone may report any issue that they feel violates the SolonTek Code of Conduct. Anonymous reporting channels are available by phone **1-984-500-5970**.

Email: integrity@solontek.us **By Mail:** 15128 S. Harlan Rd. #417, Lathrop, Ca 95330 **By Internet:** www.solontekintegrity.com

Business Practices, Ethics, and Compliance

SolonTek Partners agree to conduct their business with SolonTek Partners and SolonTek customers in accordance with applicable laws, regulations and with respect, integrity, and accountability. This means being fair, and ethical.

- **Anti-corruption** - SolonTek Partners will abide by all applicable anti-corruption and anti-money laundering laws. All forms of bribery, kickbacks and other corruption are prohibited. No SolonTek Partner will improperly influence any act or decision of any governmental official, employee or political candidate, including, without limitation, through the provision of any improper or unlawful gifts, meals, travel, or entertainment.
- **Fair Competition and Antitrust laws** – SolonTek Partners will conduct their business in full compliance with all applicable fair competition and antitrust laws.
- **Public Sector procurements** – When selling to public sector entities, SolonTek Partners will support fair and open competition by complying with all laws and regulations related to government procurement, tenders, and bids. SolonTek Partners will not conspire with other Partners, including but not limited to bid rigging, placing orders prior to tender finalization, price fixing, or other forms of collusion.

- **Business Records and Accounting** – The business records of SolonTek Partners will conform with applicable legal, accounting, and regulatory requirements. SolonTek Partners will not place any orders for SolonTek technologies, products, services, or support without an existing customer order and/or agreement.
- **Technology Fraud** – SolonTek Partners are prohibited from engaging in false or misleading business practices, including practices that deceive customers and/or the public. These practices include engaging in technology fraud and activities that may mislead children, seniors, or other vulnerable consumers to purchase or subscribe to unnecessary technical support or services. SolonTek Partners shall not engage in “cold calling” of these types of consumers for the purpose of engaging in prohibited practices.
- **Conflicts of Interest** – When SolonTek Partners are advising a customer, especially a government customer, on the selection of products and services and has a fiduciary or contractual obligation to that customer, SolonTek will avoid engaging in business practices or activities that creates or could create the appearance of a conflict of interest.
- **Disclosure of Fees** – If required by law or under a customer contract, SolonTek Partners will disclose to the customer or government entity, the potential fees, commissions, or other compensation that a Partner received from SolonTek in connection with products or services being procured.
- **Advertising and Marketing** – SolonTek Partner’s marketing and advertising activities must be conducted truthfully, and in accordance with all applicable laws and regulations. SolonTek Partners must ensure that all communications to its customers be truthful, accurate, and not misleading.

Human Rights and Fair Labor Standards

SolonTek Partners will provide a safe and healthy work environment, compliant with all employment, health, and safety laws.

- **No Child Labor, No Forced Labor** – SolonTek Partners will abide by the local minimum wage and maximum working hour requirements, and are not using forced, or labor that has unreasonable limitations on a worker’s ability to leave their employment. The use of child labor is strictly prohibited.
- **Non-Discrimination** – SolonTek Partners will not illegally discriminate in hiring, compensation, access to training, promotion, termination and/or retirement decisions based on sex, race, national origin, religion, age, disability, gender identity, marital status, medical condition, physical or mental disability, pregnancy, sexual orientation, political affiliation, union membership, veteran status or other protected characteristics or status.

Professional Conduct

SolonTek Partners shall conduct themselves in a professional manner at all times, helping SolonTek to create an inclusive, productive, respectful, and professional environment, free from any forms of discrimination or harassment.

- **Contract Behavior** – In the event that SolonTek is contracted to perform services for a customer, where that customer interacts with SolonTek and/or with any of SolonTek's employees, subcontractors, agents, or customers, regardless of the “customer agreement” in place, SolonTek Partners must behave in a professional manner including not being dishonest on another’s behalf or put SolonTek in any legal situation by conducting unethical or illegal business practices on behalf of SolonTek or on behalf of a SolonTek customer or partner. All SolonTek Partners must adhere to this Code of Conduct.
- **Inappropriate Language** – SolonTek Partners will not use any form of language that may be considered discriminatory, intimidating, harassing,

threatening, abusive, sexually explicit, or otherwise offensive or inappropriate.

- **Treat Others with Respect, Dignity, and Fairness** – SolonTek has a “ZERO” tolerance for sexual harassment or other harassment. SolonTek Partners shall not engage in any form of sexual harassment or other harassment. Sexual harassment is unwelcome verbal, or physical behavior based on sex and includes gender-based harassment of a person of the same gender. Examples are unwelcome sexual advances, physical contact, sexual comments, inappropriate gender-based jokes, unwelcome romantic attention, offering a benefit or preferential treatment in exchange for sexual favors, sharing or displaying sexually explicit content or using sexually degrading words. Examples of other harassment include comments, jokes, degrading words based on sex, race, national origin, religion, age, disability, pregnancy, marital status, medical condition, physical or mental disability, sexual orientation, political affiliation, union membership, veteran status, or other protected characteristics or status.
- **Event Behavior** – In any event that is sponsored or hosted by SolonTek, during which SolonTek Partners may interact with any SolonTek employees, agents, subcontractors, or customers, regardless of the location, SolonTek Partners must behave in a professional manner including responsible alcohol use and continued adherence to this Code of Conduct.

Environmental Regulations and Protections

SolonTek expects SolonTek’s Partners to share SolonTek’s Commitment to the environment.

- **Registrations & Permits** – SolonTek Partners will comply with all applicable environmental laws and regulations, keep current all required environmental registrations and permits relevant to its business and implement appropriate conservation measures.

Intellectual Property and Protection of Information

SolonTek Partners shall respect intellectual property rights, protect confidential information, and comply with privacy rules and regulations.

- **Acquired Software** – SolonTek Partners will only use information technology and software that has been properly obtained and licensed.
- **Ownership Rights** – SolonTek Partners will respect the intellectual property ownership rights of all third parties. SolonTek Partners will only use lawful methods of gathering competitive intelligence about products or manufacturers that compete with SolonTek technologies.

Governance

SolonTek Partners are expected to develop a culture of compliance with a process of continual improvement.

- **Risk Management** – SolonTek Partners shall have applicable business and technical controls to detect and prevent unlawful conduct by their employees and counterparties. These controls should be adequately resourced and be periodically reviewed and updated to take into account the current risk landscape.
- **User Awareness & Training** – SolonTek Partners will ensure that they have an adequate training program that achieves the appropriate levels of knowledge and skills to maintain compliance with applicable laws, regulations, and standards.
- **Violations** – SolonTek Partners will provide reasonable assistance to SolonTek in connection with any investigation of a violation of this Code of Conduct or applicable law. SolonTek Partners permit SolonTek reasonable access to all records and other applicable documentation concerning a Partner's compliance with this Code of Conduct.

Raising Concerns and Reporting Questionable Behavior

Partners are encouraged to work with their primary SolonTek contact in resolving a business practice or compliance concern. However, SolonTek realizes that there may be instances where this is not possible or appropriate. In such instances, SolonTek Partners should report any concerns about violation of this policy or applicable laws to their legal department and/or their compliance officer. SolonTek has the following reporting alternatives:

By Internet:

www.solontekintegrity.com

By Phone:

984-500-5970 M-F 9am – 5pm PST

By Mail:

15128 S. Harlan Rd. #417

Lathrop, Ca 95330