

WYCOM CORP CODE OF CONDUCT

FOR THIRD PARTIES



OUR SHARED COMMITMENT

By making this Code of Conduct part of your relationship with WYCOM, we are acknowledging your critical role in supporting and protecting one of our most valuable assets - the trust that our customers, investors, and employees place in WYCOM and our business associates.

You must ensure that your employees and contractors working with WYCOM understand their obligations to follow the standards described in this Code of Conduct. In addition, WYCOM expects that you will maintain your own compliance policies and provide training and resources to your personnel in support of a strong culture of business ethics.

RESPONSIBLE BEHAVIOR

Compliance with Laws and Regulations

BRIBERY & CORRUPTION

WYCOM will not tolerate any form of bribery or corruption and we insist that our business associates comply with all applicable anti-corruption laws and regulations, including, but not limited to the U.S. Foreign Corrupt Practices Act and the UK Bribery Act. Making or offering bribes, kickbacks, other payments, or items of value, directly or indirectly, to anyone for the purpose of wrongfully obtaining or retaining business related to products or services provided by WYCOM or resold by you is prohibited.

This includes officials, employees, or representatives of any government, political parties, candidates for office, public or international organization, as well as any third party where there is reason to believe that it will be passed onto anyone involved in the business decision process for the purpose of influencing the decision.

Any travel-related expenses and business amenities provided must be reasonable, tied to a product demonstration and not provided for the purpose of obtaining or retaining WYCOM business.

We also do not allow “facilitation payments” – small sums paid to government officials to expedite or facilitate non-discretionary actions or services such as obtaining a visa or customs clearance.

CONFLICT MINERALS

WYCOM requires due diligence throughout its supply chain to prevent the use of conflict minerals that are obtained from the Democratic Republic of Congo (DRC) and other war zones or areas of conflict worldwide. Many conflict minerals (including tin, tantalum, tungsten, and gold) are used in the manufacturing of electronic equipment and other products, and WYCOM suppliers are expected to develop reasonable policies and processes to ensure all products are responsibly manufactured.

Suppliers must fully cooperate with WYCOM's due diligence efforts, including responding in a timely way to any inquiries regarding the sourcing and origin of the components and products WYCOM buys.

EQUAL EMPLOYMENT OPPORTUNITY

WYCOM business associates must provide workplaces free from unlawful harassment and discrimination. This includes physical and verbal behavior that is abusive, offensive, or threatening and targets characteristics protected by laws applicable to the business. It also includes employment decisions based on legally protected traits.

WYCOM further encourages its business associates to promote a diverse and inclusive workforce regardless of applicable law in-order to maximize the talents and potentials of their employees and teams.

FAIR COMPETITION

We expect our business associates to compete fairly and ethically for all business opportunities. This includes conducting business in accordance with all applicable antitrust and fair competition laws and regulations. Examples of prohibited anti-competitive conduct include and are not limited to: (1) discussing pricing with competitors; (2) discussing or agreeing to divide or share markets or customers; (3) coordinating with competitors on bids/proposals; and (4) joining with others to boycott suppliers or clients. In addition, your employees and agents involved in representing WYCOM or selling/promoting our products and services must be truthful in their communications and representations and must not make any unauthorized commitments on WYCOM's behalf.

FINANCIAL REPORTING/ACCURATE RECORDKEEPING

We expect accurate and reliable records that fully represent the event or business transaction that took place. This applies to all submissions you make to WYCOM or its clients, including, but not limited to, financial information, labor costs, business expenses, business reports and documentation, and required deliverables. WYCOM will not tolerate business associates that conceal or misrepresent records while conducting business in-support or on behalf of WYCOM.

In addition, any business associates performing work in support of a U.S. Government contract must comply with the Federal Acquisition Regulations (FAR) Subpart 4.7, Contractor Records Retention as applicable.

HUMAN TRAFFICKING/HUMAN RIGHTS VIOLATIONS

Good corporate citizenship and compliance with applicable laws and regulations require that our suppliers and vendors respect human rights in all aspects of their business operations. Suppliers will adhere to all applicable laws that combat human trafficking, child labor, indentured servitude and forced or unlawful labor practices, and fully cooperate in WYCOM's diligence processes to ensure no such practices exist within our supply chain.

GLOBAL TRADE COMPLIANCE

As a global company, WYCOM must follow export/import laws and regulations concerning controlled products, technical data, software, as well as the provision of defense services. Importantly, these legal obligations extend to our business associates regardless of their location around the world. We expect our business associates to be familiar with all applicable export and import laws and regulations with regards to defense services, controlled products, and technology. Failure to comply with all applicable export/import regulations could expose WYCOM and yourself to potential fines, criminal prosecution, and loss of export privileges.



ACCOUNTABILITY

Adhere to Best Business Practices

INFORMATION SECURITY

Information security is no longer a technology focused problem but a basic requirement for business survival. WYCOM is committed to the protection of information, information systems and critical infrastructure while protecting the confidentiality, integrity, and availability of information across the WYCOM Domain. The purpose of securing information is to help protect people, property, products, processes, and information systems by enhancing security throughout WYCOM's supply chain.

It is expected that your organization follows best practices and industry standards to protect the confidentiality, integrity, and accessibility of WYCOM information, including personal information, through appropriate physical and cyber-security procedures. This includes but is not limited to, protecting privileged access (credentials) to the WYCOM Domain, utilizing, and maintaining high quality passwords, installing and maintaining security software on digital devices, keeping antivirus software up-to-date, running regular security scans on digital devices, and avoiding potential sources of cyber infection.

Furthermore, your organization must comply with all applicable data privacy laws and ensure these requirements are met by all sub-tier vendors/suppliers they employ in support to WYCOM business. If you become aware of a real or potential data breach or cyberattack, affecting WYCOM data or systems, or that of our customers or their patrons, you must promptly notify our Chief Information Security Officer and keep us apprised of your actions to address and remedy the issue.

CONFIDENTIAL INFORMATION

As our business associate, you may be entrusted with sensitive information that WYCOM or its customers consider to be proprietary, confidential, or personal. You must

rigorously protect the confidentiality of all such information, use the information only for the intended purpose that it was provided to you, and ensure that the information is not reproduced, or released to anyone outside your organization unless you are properly authorized to do so.

CONFLICTS OF INTEREST

We expect our business associates to avoid personal and organizational conflicts of interest when dealing with WYCOM.

Any act that could be perceived as favorable treatment or biased can cast doubt on our integrity and put our reputation at risk. You must avoid even the perception of a conflict of interest and promptly report any instances of actual or potential conflicts between yourself or your personnel and those of WYCOM or its customers. For example, you must promptly disclose to WYCOM all known family relationships and any material financial or business relationships between any of your principals, employees or agents and WYCOM's employees or agents.

GIFTS, MEALS AND ENTERTAINMENT

You must not use the exchange of business courtesies (i.e., meals, hospitality, entertainment, travel costs and gifts) with private, commercial or government customers to gain an unfair advantage or improperly influence business decisions. WYCOM and its customers and suppliers must compete on the merits of their products and services, and offering or accepting a gift or meal is only permissible when it is modest in value, consistent with local customs or practices and not contrary to any applicable law.

Furthermore, you must not offer or pressure any individual to accept a business courtesy that you know would be contrary to their employer's own rules or policies. For example, our government customers often prohibit their employees from accepting even nominal items or modestly priced meals.

COMPLIANCE & COOPERATION

You agree to conduct your business dealings with WYCOM, and with others on WYCOM's behalf, in accordance with these standards. You will advise your employees and contractors working under your contract with WYCOM of these standards and their obligation to comply. If requested by WYCOM, you will cooperate with our efforts to investigate an alleged violation of this Code of Conduct involving your employees or contractors. You will also provide information that WYCOM may request in connection with its periodic revalidation of you or your company's business relationship with WYCOM. You will maintain documentation reasonably necessary to demonstrate your compliance with this Code of Conduct and provide WYCOM or its independent auditor with access to such documentation upon reasonable request. Any material violation of this Code of Conduct may form the basis for termination of your business relationship(s) with WYCOM, including all related contracts.

REPORTING VIOLATIONS

We need your help to support our shared commitment to strong business ethics. If you become aware of any unlawful or unethical situation related to business conducted with or on behalf of WYCOM, you must promptly notify us via our third-party hosted Helpline: 888-220-9286. Please include any information that you have regarding the incident or situation. WYCOM takes all reports of illegal or unethical conduct seriously and will conduct a prompt and thorough review or investigation. WYCOM does not permit or condone retaliation against any person for reporting a suspected issue in good faith. Likewise, we will not tolerate our business associates retaliating against their employees for reporting an issue to us in good faith. Retaliation by, or against, a business associate employee or agent is a violation of this Code of Conduct and may result in suspension or termination of our business relationship.

WWW.WYCOMCORP.COM

Corporate Phone Number: 858-634-4850

Helpline: 888-220-9286