

## 2ndQuadrant Supplier Code of Conduct

2ndQuadrant is committed to conducting its business in accordance with the applicable laws and regulations of the countries in which it operates and in accordance with internationally recognized industry standards of business ethics and social and environmental responsibility.

This commitment to corporate responsibility applies to us as a company and extends to our supply chain. We hold ourselves to this code, and expect our suppliers of goods and services, which encompasses suppliers, sub-contractors, distributors, resellers, or any company with which 2ndQuadrant enters into a partnership agreement (“Suppliers”) to comply with the applicable laws and regulations of the countries in which they operate and to conduct their operations in an ethical, socially and environmentally responsible manner, and in accordance with this 2ndQuadrant Supplier Code of Conduct (the “Code”). 2ndQuadrant Suppliers should ensure that their own suppliers comply with the same requirements.

In selecting and retaining Suppliers, 2ndQuadrant will take into consideration whether a Supplier is in compliance with the Code. Should a Supplier fail to demonstrate commitment to the Code or fail to implement appropriate corrective actions to improve performance, 2ndQuadrant may choose to suspend making purchases from the Supplier or terminate its relationship with that Supplier.

### Compliance with Laws

2ndQuadrant and its Suppliers shall comply with all applicable laws and regulations including without limitation, laws and regulations aiming to protect human rights, fight against corruption, money laundering, terrorism, as well as laws and regulations related to antitrust, data protection, international trade compliance, health, workplace safety, and environment.

### Human Rights

2ndQuadrant and its Suppliers are expected to be committed to Human Rights and particularly to treat people with respect and dignity, encourage diversity, remain receptive to diverse opinions, promote equal opportunity for all, and foster an inclusive and ethical culture, in accordance with the relevant International Labor Organization (ILO) Conventions.

#### Child Labor

2ndQuadrant and its Suppliers must ensure that illegal child labor is not used in the performance of work. The term “child” refers to any person under the minimum legal working

ages defined by the International Labor Organization (ILO) or, if older, under the minimum legal working age for employment in the country or jurisdiction where the work is effectively performed.

#### Human Trafficking, including Forced or Indentured Labor

2ndQuadrant and its Suppliers must adhere to regulations prohibiting human trafficking and comply with all applicable local laws in the country or countries in which they operate.

2ndQuadrant and its Suppliers must refrain from violating the rights of others and address any adverse impact their operations may have on human rights.

#### Harassment and healthy working environment

2ndQuadrant and its Suppliers are expected to ensure that their employees are afforded an employment environment that is free from physical, psychological, and verbal harassment, or other abusive conduct. Furthermore, 2ndQuadrant and its Suppliers must provide a safe and healthy working environment for their employees.

#### Non-discrimination

2ndQuadrant and its Suppliers are expected to provide equal employment opportunity and treatment of employees through non-discrimination on the grounds of especially ethnic origin, sex, age, sexual orientation, trade-union membership, personal political or religious beliefs.

2ndQuadrant and its Suppliers also endeavor to provide a working environment that encourages the employment of people with disabilities (subject to local legislation).

2ndQuadrant and its Suppliers are also expected to treat applicants for employment without discrimination.

#### Wage and Benefits

2ndQuadrant and its Suppliers must pay workers at least the minimum compensation required by local law and provide all legally mandated benefits. In addition to payment for regular hours of work, workers must be paid for overtime at such premium rate as is legally required or, in those countries where such laws do not exist, at least equal to their regular hourly payment rate. Deduction from wages as a disciplinary measure should not be permitted.

2ndQuadrant and its Suppliers must operate a health protection system within the applicable statutory requirements.

#### Social dialogue

2ndQuadrant and its Suppliers are expected to respect the rights of workers to associate freely and communicate openly with management regarding working conditions without fear of harassment, intimidation, penalty, interference or reprisal. 2ndQuadrant and its Suppliers are also expected to recognize and respect any rights of workers to exercise lawful rights of free association, including joining or not joining any association of their choosing.

## Anti-Corruption

2ndQuadrant and its Suppliers are required to comply in all situations with foreign and domestic laws and regulations against bribery, corruption and influence peddling.

2ndQuadrant and its Suppliers are expected to provide on a regular basis adequate training to their employees and executives and in particular the most exposed employees.

Whether directly or through third parties, 2ndQuadrant and its Suppliers will not solicit or accept for themselves any offer, promise, gift, present or benefit whatsoever, to make illegitimate use of their influence with a view to taking or obtaining any favorable decision. This includes, but is not limited to, offering or making improper payments of money or offering anything of value to government officials, political parties, candidates for public office, or other persons.

2ndQuadrant and its Suppliers are expected to compete on the merits of their products and services. The exchange of business courtesies may not be used to gain an unfair competitive advantage. In any business relationship, 2ndQuadrant and its Suppliers must ensure that the offering or receipt of any gift or business courtesy is permitted by law and regulation, that these exchanges do not violate the rules and standards of the recipient's organization and are consistent with reasonable marketplace customs and practices.

## Other Illegal Practices

### Competition and Antitrust

2ndQuadrant and its Suppliers are required to comply with laws and regulations aiming at the protection of competition and prohibiting antitrust practices. They must respect the principle of free price-setting and not fix prices or rig bids with their competitors. They must not share the market with competitors. They must not exchange current, recent, or future competitively sensitive information (including, but not limited to, pricing information) with competitors.

2ndQuadrant and its Suppliers must refrain from participating in a cartel. 2ndQuadrant and its Suppliers holding a dominant position must not fix commercial conditions that could be characterized as excessive, discriminatory or loyalty-inducing or otherwise abusing their dominant position. They must enable access to essential technology or infrastructure.

### Insider trading

2ndQuadrant and its Suppliers and their personnel must not use any material or non-publicly disclosed information obtained in the course of their business relationship with 2ndQuadrant as a basis for trading or for enabling others to trade in the stock or securities of any company.

### Fraud and deception

2ndQuadrant and its Suppliers must not seek to gain advantage of any kind by acting fraudulently, deceiving people or making false claims, or allow anyone else to do so. This includes defrauding or stealing from the company, a customer or any third party, and any kind of misappropriation of property.

### Conflict of Interest

2ndQuadrant and its Suppliers are required to implement policies intended to avoid all conflicts of interest or situations which could lead to a potential conflict of interest, including policies enabling employees in situations of conflict of interest (whether actual or potential) to provide notification to their line managers. This includes a conflict between the professional activities of 2ndQuadrant's and its Suppliers' employees and their personal interests or those of their close relatives, friends or associates. 2ndQuadrant and its Suppliers are expected to provide adequate training to employees who may be exposed to the risk of conflict of interest.

### Maintain Accurate Records

2ndQuadrant and its Suppliers are expected to create accurate records, and not alter any record entry to conceal or misrepresent the underlying transaction represented by it. All records, regardless of format, made or received as evidence of a business transaction must fully and accurately represent the transaction or event being documented. Records should be retained based on the applicable retention requirements.

### Protection of Information

#### Confidential/Proprietary Information

2ndQuadrant and its Suppliers shall properly handle sensitive information, including confidential, proprietary, and personal information. Information should not be used for any purpose (e.g. advertisement, publicity, and the like) other than the business purpose for which it was provided, unless there is prior authorization from the owner of the information.

In regard to protection of proprietary information, 2ndQuadrant and its Suppliers must comply with all applicable laws governing intellectual property rights assertions, including protection against disclosure, patents, copyrights, and trademarks.

#### Information Security

2ndQuadrant and its Suppliers must protect the confidential and proprietary information of others, including personal information, from unauthorized access, destruction, misuse, modification and disclosure, through appropriate technical, physical, organizational and

electronic security measures which shall be revised from time to time to reflect at all times, at a minimum, industry standards.

#### Protection of Personal Data

2ndQuadrant and its Suppliers and their subcontractors, suppliers or other service providers, shall comply with (i) the European Regulation 2016/679 (GDPR) on the protection of natural persons with regard to the processing of personal data and on the free movement of such data; (ii) the laws and regulations adopted to implement the GDPR and (iii) any other applicable regulation (including laws, rules, governmental requirements, codes as well as international, federal, state, provincial laws).

## Environment, Health and Safety

2ndQuadrant and its Suppliers shall take appropriate measures to operate in a manner that:

- limits the environmental impact of their operations, particularly by reducing consumption of energy and production of waste and by improving prevention and control of all other potential forms of pollution;
- actively manages, prevents and mitigates environmental and health & safety risks (avoid as much as possible use & exposure to hazardous materials, mitigate risks regarding storage conditions, manage possible re-use, re-cycle, transportation or disposal of waste, mitigate exposure to radiation, etc.);
- conserves natural resources, promotes valorization and recycling of materials;
- protects the environment in the communities within which they operate and all along their area of impact;
- ensures that their goods, works or services do not have a negative/ detrimental impact on biodiversity;
- develops a positive contribution to the fight against climate change;

And, more generally, implement all protective measures to prevent any potential risk of damage to human or animal health and to the environment. 2ndQuadrant and its Suppliers should protect the health, safety, and the welfare of their employees, contractors, visitors, suppliers and others who may be affected by their activities.

2ndQuadrant and its Suppliers shall ensure that all their operations, including their own supply chain, comply with all applicable environmental, health and workplace safety laws and regulations.

## Global Trade Compliance

### Import

2ndQuadrant and its Suppliers must ensure that their business practices are in accordance with all national applicable laws, directives and regulations governing the import of parts, components, and technical data in their jurisdiction, as well as with other foreign trade controls and/or other trade & economic sanctions or restrictions from the United States of America, the European Union, or from international trade organizations (including but not limited to those of the European Union and the United Nations).

### Export Control and Sanctions

2ndQuadrant and its Suppliers must ensure that their business practices are in accordance with all applicable national laws, directives and regulations governing the export or re-export of parts, components, and technical data in their jurisdiction as well as with other foreign trade controls and/or other trade & economic sanctions or restrictions from the United States of America, the European Union or from international trade organizations (including but not limited to those of the European Union or the United Nations).

2ndQuadrant and its Suppliers shall provide truthful, accurate and regularly updated information and shall apply and obtain export licenses, permits and/or other consents required, where necessary for the export of products from their country(ies) of manufacture.

No transaction (including import, export or re-export operations of the products) shall be conducted by 2ndQuadrant and its Suppliers, whether on behalf of 2ndQuadrant or not, with any denied or restricted entity or individual or any destination country that may be prohibited under the applicable laws and regulations of the United States of America, the European Union, or international trade organizations (including but not limited to those of the European Union and the United Nations).

### Responsible Sourcing of Minerals

2ndQuadrant and its Suppliers must comply with applicable laws and regulations regarding sourcing of minerals such as, namely, tin, tungsten, tantalum and gold, from conflict areas ("Conflict Minerals").

### Counterfeit Parts

2ndQuadrant and its Suppliers are expected to develop, implement, and maintain effective methods and processes appropriate to their products to minimize the risk of introducing counterfeit hardware parts and materials into deliverable products.

## Ethics and Compliance Program Requirements

### Ethics and Compliance Policies

2ndQuadrant and its Suppliers are expected to establish management systems, commensurate with the size and nature of their risks and business, to support compliance with laws and regulations, as well as the requirements expressed within the 2ndQuadrant Supplier Code of

Conduct. Suppliers are encouraged to implement their own written code of conduct and to flow down their principles to the entities that furnish them with goods and services.

2ndQuadrant and its Suppliers should maintain effective programs to encourage their employees to make ethical, values-driven choices in their business dealings.

#### Ethics & Compliance Alerts

2ndQuadrant Suppliers undertake to notify 2ndQuadrant in a timely manner of any suspected violation of the 2ndQuadrant Code of Conduct that might impact their relationship with 2ndQuadrant. 2ndQuadrant and its Suppliers are expected to provide their employees with avenues for raising legal or ethical issues or concerns without fear of retaliation. 2ndQuadrant and its Suppliers are also expected to take action to prevent, detect, and correct any retaliatory actions, in accordance with any applicable domestic status and regulation.