Code of Conduct

Date	Name	Role	Change	Version
Thu Oct 29 2026	Don LeBert	Security	Approved	V5.0
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Wed Aug 30 2023	Lior Ehrenfeld	COO	Approved	V3.0
Mon Aug 28 2023	Lior Ehrenfeld	COO	Approved	V2.0
Fri Sep 23 2022	Sharon Wekselman	Head of People	Approved	V1.0

Pinecone Code of Conduct

Introduction

This Code of Business Conduct and Ethics (this “Code”) is specifically designed to provide guidance regarding the Company’s standards of integrity and business conduct.

This Code of Business Conduct and Ethics applies to all full time, part-time and temporary employees (collectively “Employees”) and agents, representatives, consultants, advisors, and other similarly titled independent contractors (collectively “Consultants”) of Pinecone Systems Inc. (the “Parent”), its branches and its subsidiaries (the “Subsidiaries”). The Parent, branches and Subsidiaries are collectively referred to herein as the “Company”.

The purpose of this Code is to promote:

1. Honest and ethical conduct, including fair dealing and the ethical handling of actual or apparent conflict between personal and professional relationships;
2. Conducting business with professional competence and integrity;
3. Full, fair, accurate, timely and understandable disclosure;
4. Compliance with applicable laws, rules and regulations;
5. Prompt reporting of violations of this Code; and
6. Accountability for adherence to this Code and to deter wrongdoing.

If a law conflicts with a policy in this Code, you must comply with the law. If you have any questions about these conflicts, you should ask your supervisor how to handle the situation.

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Those who violate the standards in this Code will be subject to disciplinary action, up to and including termination of employment.

1. Values and Operating Principles

Pinecone has three values: Outcomes, Velocity and Creativity. They aren't aspirations. They describe how we already work at our best, and we named them so we can hire, develop and recognize employees for living them. Each value comes with an operating principle that tells you how to act on it.

Outcomes

The performance value. We measure success by the value customers get, by what people are actually using.

Operating principle: Specifics.

Every initiative gets a clear outcome and a date. If we can't name what success looks like and when, the work isn't ready to begin. In practice, this means we:

- define success criteria and measurable milestones before the work starts
- commit to the deadlines we set, even if that means shipping something imperfect
- measure impact (what customers use), not effort (hours worked, lines of code, tickets closed)
- understand and address what the customer is trying to achieve
- over-communicate progress, including when something is behind or didn't work
- learn from failures and make successes reproducible

Outcomes and this Code: we report results honestly. Hitting a number never justifies an inaccurate record, a misleading claim to a customer, or a shortcut around the law

Velocity

The operations value. We decide with what's in hand and learn fast. When a bet doesn't pay off, we go back for what it taught us.

Operating principle: Speed.

Make the call with the information you have. Waiting for certainty is itself a choice, and its cost is real. Bias to the decision, then learn in the open. In practice, this means we:

- bias to action: try first, fail fast, course correct
- treat decisions as two-way doors where we can
- don't get attached to the current state, even work we invested a lot in
- keep ownership and communication clear, so nothing falls through the cracks

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- prioritize the business need at hand instead of spreading too thin
- put our work in front of people, take the feedback, and keep ego low
- retro without blame when a bet doesn't pay off

Velocity and this Code: speed applies to business judgment calls. It does not apply to the approvals and checks this Code requires, which are not bottlenecks to work around. Blameless retros are for honest mistakes and bets that didn't pay off; they don't replace reporting a possible Code violation.

Creativity

The identity value. The best ideas come from anywhere, not one room or one title, and they get sharper where teams cross paths.

Operating principle: Access.

Knowledge without barriers. We share what we know by default, in the open, searchable and built to be reused. That's what makes creativity compound. In practice, this means we:

- collaborate across functions and step into unexpected conversations
- tie new ideas to an outcome: what will it achieve, and is the effort worth it
- test ideas and back them with evidence and customer validation
- ask why, and question constraints, the status quo and the way things have always been done
- treat blockers as constraints to solve around
- listen, and make space for ideas from anyone

Creativity and this Code: "share by default" means sharing inside Pinecone with the people who should have the information. It does not loosen confidentiality. Customer data, personnel and compensation information, and anything restricted under your Confidential Information and Inventions Assignment Agreement or the Acceptable Use Policy stay restricted. Speaking up applies to concerns as well as ideas, and no one will be retaliated against for raising either in good faith.

How we hold ourselves to this

The values work as a loop: there's no velocity without focus on the right outcome, and no creativity without the right environment. We build them into how we hire, onboard, review performance, promote and recognize one another. When you see someone living a value, name it. When you see the team drift, help each other get back on track.

A value or operating principle never overrides a requirement in this Code. The values guide how we work and grow, and are not on their own a basis for discipline. Violations of the Code's requirements are handled as described in this document. For examples of what each value looks like in practice, and what drift looks like, see the Our Values page in Notion.

2. Compliance with Law

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The Company's activities and operations will be carried out in careful compliance with all applicable laws. The Company requires that all employees, officers, directors, or Consultants comply with all laws, rules and regulations applicable to the Company wherever it does business.

The Company acknowledges that there are differences in local laws and practices between countries. In some instances, the Code establishes policies and/or requirements that would not otherwise be required in some countries. In keeping with the Company's commitment to meet the highest standards of business conduct wherever it does business, all employees must comply with all aspects of the Code, even if it is not required by local laws. Conversely, there may be laws in certain countries which may not specifically apply outside of those countries, and therefore, not specifically be addressed in the Code. Employees are expected to use good judgment and common sense in seeking to comply with all applicable laws, rules and regulations and to ask for advice when uncertain about them. Without derogating from the above responsibility, the Company may add policies applicable to specific regions as required or appropriate under local laws.

3. Corrupt Practices Prohibited

The Company has no tolerance for corruption or bribery in connection with our business. We are committed to complying with all applicable anti-corruption and anti-bribery laws wherever we do business, including the U.S. Foreign Corrupt Practices Act ("FCPA"), which prohibits directly or indirectly giving anything of value to a government official to obtain or retain business or favorable treatment and requires the maintenance of accurate books of account, with all company transactions being properly recorded. Violation of the FCPA or similar anti-bribery and anti-corruption laws could subject the Company and its individual directors, officers, and employees to serious civil and criminal penalties. The Company does not permit or condone bribes, kickbacks or other improper payments or benefits. The fact that, in some countries, certain laws are not enforced or that violation of those laws is not subject to public criticism will not be accepted as an excuse for noncompliance. The following prohibitions are illustrative only and are not exclusive:

No Bribery, Kick-backs, or Payoffs. In its relations with governmental agencies, actual and potential purchasers and suppliers, vendors, subcontractors, business associates, and others, the Company and its Employees and Consultants will not, directly or indirectly, engage in bribery, kickbacks, payoffs, or other corrupt business practices.

Prohibited Payments. Payments to Consultants, attorneys, suppliers, distributors, purchasers, and others are strictly prohibited if it is known or believed (or there is reason to believe) that all or a portion of such payments will be offered, given, or promised to a government employee, a member of a political party, a candidate for political office, or to an employee, officer, director, business associate, or family member of an actual or potential purchaser of Company products.

Political Contributions Prohibited. The use, directly or indirectly, of Company funds for political contributions to any organization or to any candidate for public office is strictly prohibited.

4. Proper Use of Corporate Funds and Property

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Corporate funds and assets must be utilized solely for lawful and proper corporate purposes. Transfer or expenditure of such funds or assets will be undertaken only if the stated purpose is in fact the actual purpose. The transfer or expenditure of such funds and assets must be authorized in writing in accordance with procedures established by the Company. Company equipment or other property should be handled and cared for properly and should be used only for business purposes. It should not be used for personal benefit, sold, loaned, given away, or otherwise disposed of, regardless of its condition or value, without proper authorization. Fraud, theft, embezzlement or misappropriation of Company property is prohibited.

5. Permitted Tips and Gratuities

Employees and Consultants are solely permitted to offer nominal tips, gratuities, hospitality (such as lunch or dinner at a restaurant), gifts and promotions (for example Pinecone branded items) of a customary amount or value for routine services or courtesies or as part of Pinecone's customary promotional and marketing efforts. "Nominal" value is defined as a gift of not more than $100 per annum per business associate. This amount does not include expenses for business meals.

Any other tips, gratuities, hospitality, gifts and promotions that are not standard or customary require advance written approval by the Company's VP Finance and Operations, with a copy of the approval to be attached to the expense report or expense receipt. All receipts for such expenditures must be submitted to the Company finance department and must be recorded in the Company's books of account.

6. Gifts and Other Benefits

In connection with their business activities, Employees and Consultants may receive gifts of nominal value or accept invitations only if such gifts or invitations have no undue influence on their decision-making, are not illegal under applicable law, and would not cause embarrassment or reflect negatively on the Company's reputation. All Employees and Consultants are prohibited from receiving from or giving to any actual or potential purchaser, supplier, vendor, subcontractor, competitor or its agent, consultant or employee, or business associate of the Company, any gifts, gratuities, meals, entertainment or other benefits for greater than the nominal value. "Nominal" value is defined as a gift of not more than $100 per annum per business associate. For the avoidance of doubt, reasonable expenses on business meals shall not be considered a breach of this policy.

Under the FCPA and other anti-corruption and anti-bribery laws potentially applicable to the Company, giving anything of value to a government official to obtain or retain business or favorable treatment is a criminal act subject to prosecution and conviction. If you are uncertain about the appropriateness of any proposed gift, entertainment, meal, or other business courtesy, you should consult with a supervisor.

7. International Trade

The Company is committed to complying with all export, import, and economic sanctions, laws, and regulations applicable to our business worldwide. Failure to comply with global trade laws can result in disciplinary action for the

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Company, loss of business opportunities, monetary penalties, fines and imprisonment for individual employees and their managers, and the potential revocation of our trade privileges. Employees are responsible for understanding how international trade laws apply to their job and compliance is required.

These international trade laws include:

1. U.S. trade sanctions and embargoes, which generally prohibit U.S. companies, their subsidiaries, their employees, and third parties acting on their behalf from engaging in transactions or dealings involving certain countries and territories subject to embargoes imposed by the U.S. government, as well as specific entities and individuals identified on sanctions lists published by the U.S. Department of the Treasury's Office of Foreign Assets Control (“OFAC”), each as published and updated from quarterly;

2. U.S. export control laws, including the Export Administration Regulations, which restrict exports from the United States and re-exports from other countries of goods, software, and technology to certain countries, and prohibit transfers of U.S.-origin items to denied persons and entities; and

3. Antiboycott regulations, which prohibit U.S. companies from taking any action that has the effect of furthering or supporting a restrictive trade practice or boycott imposed by a foreign country against a country friendly to the U.S. or against any U.S. person.

The countries, territories, entities and individuals covered by these laws change, sometimes substantially and with little notice. This Code deliberately does not reproduce the list, because any list printed here will be out of date before the Code is next revised. Before entering into a transaction involving a counterparty outside the United States, check the current sanctions programmes published by OFAC at ofac.treasury.gov.

Note that a country coming off the comprehensive embargo list does not make it unrestricted. Individuals and entities in that country may still appear on OFAC's Specially Designated Nationals list, and dealings with them remain prohibited. Screening obligations continue either way.

If you have a question as to whether an activity is restricted or prohibited, seek assistance from a supervisor.

8. Written Employment and Consulting Agreements Required

Employees and Consultants will be retained and paid only pursuant to a written agreement supplied or approved by the Company's VP Finance and Operations or Head of People, and only following the express written approval by the Company Officer with authority to authorize retention of such individuals. Employees and Consultants shall be permitted to work with the Company only if they operate in conformity with their written contracts, all applicable laws and rules, and this Code.

9. Compensation Guidelines

Compensation paid to Consultants must be comparable to that paid to similar Consultants for similar work in similar territories and in accordance with lawful industry norms. Any benefits provided to Employees and Consultants in addition to their standard compensation shall be awarded in full compliance with corporate guidelines and national legislation (including tax regulations) and shall remain in line with local practice.

10. Accounting and Auditing Matters

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The Company is committed to providing accurate and reliable information to its shareholders, governmental agencies, and other entities who rely on the veracity of the Company's financial records. No false, misleading or artificial entries shall be made in the Company's books and records for any reason, and all accounting, internal accounting controls or auditing matters shall be conducted in accordance with all applicable laws.

Any concerns regarding questionable accounting, internal accounting controls or auditing matters should be -directed to the Head of People. Reports may be made on either an anonymous or non-anonymous basis.

11. Avoid Conflicts of Interest

All Employees and Consultants must avoid conflict of interest situations between their direct or indirect (including members of immediate family) personal interests and the interest of the Company. Typical conflict situations include providing services to or owning stock (or stock options) in business entities which are competitors, purchasers or suppliers of the Company. Minor shareholdings of less than 1% in listed companies are generally not considered to be conflict of interest situations.

Company Employees involved in the process of purchasing goods and services should be extremely careful in exercising their judgment in purchasing decisions. Objectivity and impartiality should be exercised when making purchasing-related decisions, and any potential conflict of interest, including any existence of prior acquaintance or family connections with any vendor, should be reported to the Company's VP Finance and Operations or Head of People.

Employees and Consultants must notify their direct supervisor of any actual or potential conflict of interest situation. The direct supervisor will advise the Operations Executive or Head of People or the relevant VP, who in turn will consult with the CEO to provide a considered and confidential response.

Separately from any conflict of interest, outside employment, consulting and advisory work require advance approval under the outside work policy, and Section 4 of your Confidential Information and Inventions Assignment Agreement prohibits outside activity that conflicts with your employment without the Company's written consent.

12. Protection of Intellectual Property

The Company recognizes intellectual property rights as well as proprietary confidential information (collectively "IP") as a central shareholder value. Employees and Consultants shall take appropriate action to preserve and enhance the Company's IP and not infringe the IP rights of other persons and entities.

13. Non-Disclosure Requirements

The written employment and retention agreements with all Employees and Consultants shall contain provisions regarding the non-disclosure and non-use of proprietary and/or confidential information received by such Employees and Consultants during the term of the relationship with the Company. Compliance with these provisions is mandatory.

Your obligations are set out in the Confidential Information and Inventions Assignment Agreement you signed. Section 1.4 of that agreement provides that the confidentiality restrictions continue indefinitely after your employment ends. Section 1.1 and Section 13.12 of that agreement set out what those restrictions do not prevent you from doing, including reporting a suspected violation of law to a government agency.

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14. Personal Behavior and Respect for Individuals

The Company strives, on a personal level, to treat each individual with dignity, consideration and respect. The Company has no tolerance for discrimination or harassment. All employment decisions are to be made without regard to race, color, age, gender, sexual orientation, religion, marital status, pregnancy, national origin/ancestry, citizenship, physical/mental disability, military status, gender identity and expression, genetic information, sexual and reproductive health decisions, caregiver status or any other basis prohibited by law. Pinecone provides reasonable accommodations to qualified applicants and team members with disabilities, absent undue hardship, as required by the Americans with Disabilities Act (ADA) and applicable state and local law. For purposes of this Code, harassment includes slurs and any other offensive remarks, jokes and other verbal, graphic, or physical conduct that could create an intimidating, hostile or offensive work environment. In addition to the above, “sexual harassment” includes unwelcome sexual advances, requests for sexual favors, and other visual, verbal, electronic, or physical conduct of a sexual nature. For full policy and reporting, please use this link.

15. Workplace Relationships

Pinecone doesn't prohibit friendships or romantic relationships between coworkers, and what you do on your own time is generally your own business. This section exists for one reason: to make sure a personal relationship never affects, or looks like it affects, decisions about someone's job. It applies to all employees and consultants, and it applies the same way regardless of the gender or sexual orientation of the people involved.

Relationships that must be disclosed

You must disclose a romantic or sexual relationship, or a close family relationship, with another Employee or Consultant if either of you:

- manages the other, directly or anywhere up the reporting line
- has a say in the other's hiring, performance reviews, calibration, promotion, compensation, equity, scheduling or work assignments
- has access to the other's confidential personnel or compensation information because of your role, for example on the People, Finance or executive teams

Disclosure is also required if you have a romantic or sexual relationship with someone at a customer, vendor, partner or candidate where you influence decisions about that business relationship or hire. This follows the same rule as any other conflict of interest under Section 10. Disclose to the Head of People, or to your manager, who will bring in the Head of People. If the relationship involves the Head of People, disclose it to the CEO or VP of Operations. You only need to share that the relationship exists. You don't need to share any personal details, and the disclosure is kept confidential and shared only with the people who need to know to resolve a conflict.
Disclose when the relationship begins, or when a role change, reorg or new hire creates one of the situations above. Leaders and managers are held to a higher standard here because of their influence over other people's work.

What happens after you disclose

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Disclosing isn't a disciplinary matter. The Head of People will work with both of you to remove any conflict. The usual fix is moving decisions so neither person influences the other's hiring, reviews, calibration, compensation, promotion or similar matters. Sometimes a change in reporting line or role is needed. Pinecone will try to agree on a solution with both people, and will make sure the person with less authority isn't the one who pays the career cost. Failing to disclose a relationship covered by this section, or refusing to cooperate with a reasonable plan to resolve a conflict, violates this Code and may lead to disciplinary action.

Conduct at work

- Keep it professional during work, on Company systems and at Company events, including offsites and anywhere alcohol is served.
- A personal relationship doesn't change confidentiality obligations. Don't share personnel, compensation or other confidential information with a partner who isn't authorized to have it.
- Advances must be welcome. If someone says no, or ends a relationship, accept it. Repeated or unwelcome advances, and any pressure tied to someone's job, are harassment.
- When a relationship ends, neither person may retaliate against the other or treat them differently at work. If a relationship that ended is affecting your work or making you uncomfortable, talk to the Head of People.
- Romantic or sexual relationships between a manager and someone in their reporting line are strongly discouraged even when disclosed, because consent is hard to separate from the power gap.

Questions and concerns

If you aren't sure whether a relationship needs to be disclosed, ask the Head of People. If you have a concern about how a relationship is affecting the workplace, report it. Reports are protected from retaliation.

16. Workplace Violence and Threats

Pinecone is committed to a work environment free from violence, threats and intimidation. This section applies to all employees and consultants across offices, work locations, company events, customer and partner sites, business travel, and any communication made using Company systems or connected to Pinecone business. These rules apply to threats from anyone connected to Pinecone, including coworkers, customers, vendors, contractors, visitors and former employees.

Prohibited conduct includes any single act or pattern of behavior that is, or could reasonably be seen as:

- physical violence, or an attempt or threat of physical violence
- intimidation, stalking, or threatening statements or gestures, whether in person, by phone, by email, on Slack or video calls, or on social media
- damage, or threats of damage, to Company property or to anyone's personal property
- bringing a weapon to the Pinecone office or a Company event, except where the law requires the Company to allow it

How Pinecone responds

Pinecone takes every threat seriously. Anyone who threatens violence, behaves threateningly or commits a violent act may be removed from the office, from Company systems or from Company events right away, and kept away while the matter is investigated. A violation leads to disciplinary action up to and including termination, or the end of a

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Consultant's engagement. Pinecone may also involve law enforcement. Nothing in this Code or any other Pinecone policy prevents the Company from acting quickly to stop a threat from being carried out or a dangerous situation from developing.

Reporting

If anyone is in immediate danger, call 911 first. Report any threat or threatening behavior as soon as you can, whether it was aimed at you or you saw or heard about it. This includes threats against you or your family that are connected to your work. Report to any of the following:

- your manager
- the Head of People, or People Operations at hr@pinecone.io
- any member of the executive team

If you aren't sure whether something counts, report it anyway. Pinecone will keep reports and the identity of anyone who reports as confidential as possible. Retaliation against anyone who reports in good faith or takes part in an investigation is prohibited.

Support for Employees who are threatened

If you are dealing with threats or violence, whether from inside or outside work, Pinecone will work with you, your manager and the People team on a plan that fits your situation. Depending on your circumstances, this may include:

- flexible hours or schedule changes so you can go to court, see counsel, find new housing, get counseling or arrange child care
- paid or unpaid time off, including any leave available to you under the laws of your state
- switching between the office and remote work
- limiting what is shared about you: Pinecone won't confirm your location, schedule or contact details to outside callers, and can help you adjust your calendar visibility, Slack profile or public-facing information
- help putting together a safety plan, including through the mental health and counseling resources available in Pinecone's benefits program
- security or visitor measures at the NYC office
- coordination with law enforcement when appropriate

To help Pinecone help you, keep any threatening messages (emails, texts, voicemails, Slack messages and screenshots), share any protective or restraining order that covers the workplace, and make sure the People team has a current emergency contact for you. If you take time away, agree on a check-in plan with People Operations and a plan for coming back.

17. Smoking and Vaping

In keeping with Pinecone’s intent to provide a safe and healthful work environment, smoking and vaping is prohibited throughout the workplace. Employees who choose to smoke or vape must do so outside the building. Time for smoking or vaping breaks should be limited accordingly.

18. Drugs and Alcohol

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Participation in alcohol-related events and activities at Pinecone is permitted. All employees, regardless of employment status, are expected to set responsible limits with alcohol and not to indulge in excess.

Whenever employees are working, present on Pinecone's premises, or conducting company-related work offsite or at events, they are prohibited from:

- Possessing, buying, or selling an illegal drug
- Use of drugs or other substances that may hinder job performance or judgment

If any illegal drugs or drug paraphernalia are found, the employees may be subject to disciplinary action, up to separation of employment.

18.a. Employee Assistance

Employees experiencing issues with drugs or alcohol are encouraged to use the support and resources available through Pinecone's benefits program. Pinecone offers comprehensive and integrated physical, mental and behavioral health insurance coverage through Justworks, which also provides additional access to virtual care through One Medical, Talkspace, Teladoc, and WellHub. Other resources on mental health and wellbeing can be found in Notion.

19. External Communication Policy

As Pinecone and its market profile grow, it is critical that each employees understand the guidelines, approach, and approval processes required for engaging with media, or other influencers such as bloggers, podcasters, or industry analysts.

This policy exists to protect Pinecone employees, as well as Pinecone's company reputation. Remember that a misstatement could not only impact your personal reputation, but also the company and your colleagues. This policy applies to all employees and consultants

No Pinecone employees is permitted to speak with the media or engage with any of the audiences above without prior approval from Pinecone's head of marketing or head of communications. Any employees wishing to speak to the media, or engage with any of the influencers above, should contact Pinecone's head of marketing or head of communications by Slack or email to express interest in speaking on behalf of the company, to discuss the opportunity, messaging and positioning, and then together determine the appropriate next steps. If approval is granted, the head of marketing will determine necessary preparation including if training is needed.

If a reporter reaches out directly to you, either as a first-time or relationship-based inquiry, you must engage Pinecone's head of marketing or head of communications before responding. This includes opportunities external to Pinecone where you are appearing with representing Pinecone, as well as written and verbal media appearances.

20. Enforcement and Compliance with Code

All officers, executives, and managers of the Company are responsible for the enforcement of, and compliance with, this Code, including necessary distribution to ensure Employee and Consultant knowledge and compliance. Non-compliance with this Code will result in disciplinary measures up to and including termination of the relationship with the Company.

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21. Distribution of Code

All new Employees and Consultants shall be provided with a copy of this Code within thirty (30) days of joining the Company. The Code and any amendments thereof shall be available to the Company's employees and contractors. Any questions on this Code should be addressed to People Operations.

This Code may be amended from time to time with or without notice by the Company.

22. Related Policies

This Code sits alongside the following, which Employees and Consultants are also required to follow:

- The Acceptable Use Policy
- The Human Resources Policy, which sets out the hiring and termination processes and, at section 7.3, assigns ownership of the security awareness and training programme to the Head of Security
- Your Confidential Information and Inventions Assignment Agreement, which contains your confidentiality, invention assignment, duty of loyalty, non-solicitation and non-competition obligations
- Harassment, Discrimination and Retaliation Prevention Policy
- Outside Work Policy
- Accomodation Policy

23. Reporting Code Violations

Any Employee who knows or believes that another Employee or Consultant of the Company has engaged or is engaging in conduct related to the Company that violates applicable law, this Code or any other code or practice standard applicable to such an individual, should report this information either personally or anonymously to a supervisor or the Head of People or one of the Company's executive officers. Any supervisor or officer who receives a report of a violation of this Code must immediately inform the Operations Executive or Head of People. If your concern involves your manager, report it to the Head of People. If it involves the Head of People, report it to the CEO or the VP Finance and Operations.

Employees concerned about matters involving accounting, internal accounting controls or auditing matters should report their complaints immediately as follows: (1) by email, hr@pinecone.io; or (2) by postal mail, to Pinecone, 548 Market St, PMB 19327, San Francisco, California 94104-5401 Attention: Operations Executive or Head of People ; or (3) by telephone, to the Head of People. The Head of People will ensure that the Operations Executive or Chairman of the Board is informed of Reports received and the action being taken.

This Code should not be construed to prohibit you from testifying, participating, or otherwise assisting in any state or federal administrative, judicial, or legislative proceeding or investigation.

Nothing in this Code limits or prohibits you from filing a charge or complaint with, or otherwise communicating or cooperating with or participating in any investigation or proceeding that may be conducted by, law enforcement or any federal, state or local government agency, entity or commission, including the Securities and Exchange Commission, the Equal Employment Opportunity Commission, the Occupational Safety and Health Administration, and the National Labor Relations Board, without giving notice to or receiving authorization from the Company. Nothing in this Code limits your right to discuss the terms and conditions of your employment with others to the extent permitted by Section 7 of the National Labor Relations Act, or to disclose information about possible or actual unlawful acts in the workplace, including harassment. These protections mirror Section 13.12 of your Confidential Information and Inventions Assignment Agreement.

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24. Investigating and Resolving Concerns

All reports of possible violations will be investigated by the CEO, Operations Executive or Head of People. The CEO, Operations Executive or Head of People may, in their discretion, assume responsibility for evaluating any possible violation and directing or conducting any investigation or may delegate any portion of such responsibility to another person or entity within or outside the Company.

All reports of possible violations will be handled with the utmost care and receive a thorough review.

After conducting the investigation, the results will be evaluated and the Company will authorize such swift response, follow-up and preventive actions, if any, as are deemed necessary and appropriate to address the substance of the reported possible violation. The Company reserves the right to take whatever action it believes appropriate, up to and including the discharge of any Employee determined to have engaged in improper conduct. The Company will strive to keep all reports of possible violations and the identity of those who submit them and participate in any investigation as confidential as possible. Neither the Company nor any person associated with the Company shall discharge, demote, suspend, threaten, harass or in any other manner discipline, discriminate or retaliate against any person or entity because they report any violations or cooperates in any investigation or inquiry regarding violations of applicable law or this Code using the methods outlined above. However, the Company may take disciplinary action against an Employee or Consultant who provides an incorrect report on violations of the Code if the report was not made in good faith.

Any waiver of the Code for executive officers and directors and any other employee of the Company may be made only by the CEO or VP Finance & Operations.

* * *

I hereby confirm that I have read and will comply with the above Code of Conduct and Ethics.

Name: _____

Date: _____

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