



Code of Business Conduct and Integrity Policy

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As we continue to lead the way in the global mobile ecosystem, I want to reaffirm our unwavering commitment to integrity and ethical standards. This document, our Integrity Policy and Code of Business Conduct, serves as a guide to ensure that everything we do at Interop Technologies is aligned with our core values and the highest standards of ethical business conduct.

Our Integrity Policy is central to who we are as a company. It emphasizes honesty, transparency, and accountability in all our actions. We are committed to treating our employees, customers, and partners with the utmost respect and dignity. Every member of our team plays a vital role in upholding these principles, starting with understanding and embodying this policy in their daily work.

Alongside our Integrity Policy, our Code of Business Conduct outlines the specific standards and behaviors expected of everyone at Interop. This Code applies to all employees, officers, and directors, regardless of their location. Everyone is responsible for their actions and for maintaining and enhancing our company's integrity. This Code provides a framework to help navigate any ethical dilemmas that may arise.

While this document may not cover every possible scenario, it is designed to offer a solid foundation. Should any questions arise about the application or interpretation of these guidelines, employees are encouraged to consult their supervisors, managers, or our HR and legal teams. Our collective integrity and ethical behavior are critical to our ongoing success.

Our continued success hinges on our ability to uphold the highest standards of business conduct in all our interactions. Interop Technologies strives to be not just a leader in technology but also a beacon of integrity and ethical excellence.

Thank you for your unwavering commitment!

Sincerely,

John Dwyer
President & Chief Executive Officer

Introduction

The Integrity Policy and Code of Business Conduct of Interop Technologies serve as our commitment to conducting business legally and ethically. These guidelines apply to all employees, managers, and directors, regardless of location.

The purpose of this document is to prevent unethical behavior, address any violations promptly, and ensure accountability. While it doesn't cover every possible situation, it provides a framework to help you navigate ethical dilemmas and uphold our standards. Adherence to these principles is a condition of employment at Interop Technologies. For detailed policies and procedures, please refer to the Company's intranet site. If you have questions about the Code or Integrity Policy, please follow the procedures outlined in the "Implementation, Enforcement, and Acknowledgement" section.



INTEGRITY POLICY

Purpose

The purpose of this Integrity Policy is to underscore Interop Technologies' commitment to maintaining a culture of integrity and ethical behavior. This policy outlines the principles that guide our actions and decisions, ensuring we uphold the highest standards of honesty, transparency, and accountability.

Scope

This policy applies to all employees, officers, directors, contractors, and partners of Interop Technologies, regardless of their location or position within the company.

Core Principles

1. Honesty and Transparency

At Interop Technologies, we believe that honesty and transparency are the foundations of trust. All employees are expected to communicate truthfully and openly, providing accurate and complete information in all business dealings and interactions.

2. Accountability

Every employee is responsible for their actions and decisions. We encourage an environment where employees feel empowered to take ownership of their work and are accountable for their behavior and outcomes. Mistakes should be acknowledged and corrected promptly.

3. Respect for Others

We are committed to creating a workplace where all individuals are treated with respect and dignity. This includes respecting diverse perspectives, valuing contributions, and fostering an inclusive environment where everyone can thrive.

4. Ethical Decision-Making

Employees are expected to make decisions based on ethical considerations, even when facing challenging situations. This includes considering the broader impact of their actions on colleagues, customers, partners, and the community.

5. Confidentiality and Privacy

While our Code of Business Conduct addresses confidentiality in detail, this policy reiterates the importance of respecting and protecting the privacy of personal and sensitive information. Employees must handle such information with care and integrity.

6. Conflict of Interest

Employees should avoid situations where personal interests could conflict with the interests of the company. This includes being vigilant about potential conflicts and addressing them proactively.

7. Fair Treatment

We are committed to fairness in all our dealings, whether with employees, customers, suppliers, or partners. This includes providing equal opportunities and fostering a merit-based culture.

Reporting and Addressing Concerns

1. Open Communication

We encourage employees to speak up if they encounter or observe any behavior that does not align with our integrity standards. Open communication channels are essential for maintaining our ethical culture.

2. Non-Retaliation

Employees who report concerns or participate in investigations in good faith are protected from retaliation. We are committed to ensuring that everyone feels safe and supported when raising ethical issues.

3. Resolution and Improvement

Reports of unethical behavior will be investigated promptly and thoroughly. Appropriate corrective actions will be taken to address any issues. We continuously strive to improve our policies and practices to prevent future occurrences.

Training and Awareness

1. Managerial Responsibility

It is the responsibility of department managers and leaders to ensure that employees are aware of and adhere to this Integrity Policy. Managers should discuss the principles of this policy with their teams and lead by example in demonstrating ethical behavior.

2. Continuous Improvement

We are dedicated to continuously improving our integrity practices. Feedback from employees and stakeholders is invaluable in helping us uphold our commitment to ethical behavior.

CODE OF BUSINESS CONDUCT

1. Compliance with laws

In performing your responsibilities, you should strive to comply with and take all necessary actions within your areas of responsibility to ensure the Company complies with applicable laws, rules, and regulations in every country where the Company operates. These laws may include, but are not limited to, those governing interactions with vendors or competitors, our ability to export technology to and from specific locations or to conduct business in certain areas, the protection of individuals' privacy and confidential information, and our interactions with governmental agencies. If you are unsure whether your actions are in compliance with applicable laws, you should contact the Interop Technologies legal department.

2. Fair dealing and competition

Interop Technologies is committed to competing for business ethically and in compliance with our policies and the law, regardless of the competitive environment. We sell our products and services based on their quality. In performing your responsibilities, you should strive to deal fairly with the Company's customers, suppliers, competitors, and employees. Avoid making false or misleading statements about competitors, their products, or their services. Additionally, ensure that you do not misrepresent the quality, features, or availability of our products and services.

You should never take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unethical practice. We aim to win business based on the quality of our products and our people. Eliminating or reducing competition through illegal means is strictly prohibited.

When interacting with competitors, including at trade association activities, do not discuss our pricing, terms, or marketing plans, nor seek information about the pricing, terms, or marketing plans of our competitors. If you inadvertently come into possession of confidential information about a competitor, you should immediately destroy it and not use it.

Before entering into any written or informal agreement with a competitor, you should contact the Interop Technologies legal department to ensure compliance with all antitrust and competition laws.

3. Conflict of Interest

A conflict of interest arises when an individual's personal interests interfere, or appear to interfere, with the interests of the Company. You must avoid any action, investment, interest, or association that interferes, may interfere, or appears to interfere with your ability to perform your responsibilities objectively and effectively. A conflict of interest can also occur if you or a family member receives improper personal benefits due to your position with the Company. You should interact with all partners, customers, and others doing business with the Company in a fair and objective manner, without favor or preference based on personal or financial considerations. Below are examples of common conflict of interest situations and guidance on how to handle them. This list is not exhaustive but provides general guidance:

3.1 You should not accept or give any gift or entertainment from or to any partner, customer, or competitor except as allowed under the "GIFTS AND ENTERTAINMENT" section of this Code.

3.2 You should not conduct business with a close relative on behalf of the Company unless the transaction is conducted on arm's-length terms and you have disclosed it in writing to our General Counsel, who must determine that the transaction is consistent with this Code.

3.3 You should not, directly or indirectly, own a material financial interest or hold any employment, managerial, or advisory position with any firm or corporation that competes with or seeks to do business with the Company unless disclosed in writing to our General Counsel, who must determine that the transaction is consistent with this Code.

3.4 You should not, directly or indirectly, hold any employment, managerial, or advisory position with any firm or corporation that might interfere with your performance of regular duties, including performing any duties for such firm or corporation during times when you are expected to be performing duties for the Company.

3.5 You should not seek or accept loans or other guarantees of obligations for yourself or your family members, unless you have received written approval from our General Counsel, or if appropriate, the Board of Directors or a committee of the board.

If you believe any of the situations described above, or any other situations that may involve a conflict of interest, may apply to you, you have an affirmative duty to disclose such conflict of interest to the corporate officer responsible for your function. They will review the situation with the General Counsel to determine if the transaction is consistent with the Code. If it is determined that such conduct is not consistent with the Code, you are obligated to take the necessary steps to correct the situation.

4. Corporate Opportunities

You are prohibited from (a) taking personal advantage of opportunities that you discover through the use of Company property, information, or your position without the consent of a Corporate Compliance Officer, (b) using Company property, information, or your position for personal gain, or (c) competing with the Company, directly or indirectly. You have a duty to advance the legitimate interests of the Company when the opportunity arises. For clarity, this prohibition does not override any rules established in the Company's foundational governance documents.

5. Insider Trading

I. Purpose

Anyone who has knowledge of "material nonpublic information" may be considered an "Insider" for purposes of the federal securities laws prohibiting insider trading. During your employment you may become aware of information relating to a third party, such as a customer or supplier, that would be considered material nonpublic information. As a result, it is a violation of the policy for any officer, director, or employee of the Company to:

- a. Trade in securities of any third party while aware of material nonpublic information concerning such third party.

- b. Communicate, “tip,” or disclose material nonpublic information to outsiders so that they may trade in securities of such third party based on that information.

To prevent even the appearance of improper insider trading or tipping, the Company has adopted this Insider Trading Policy for all its directors, officers, and employees, as well as for others who have access to information through business relationships with the Company.

II. Scope

- a. Covered Persons: This policy covers all directors, officers, and employees of the Company and their respective family members, as well as any outsiders designated as Insiders due to their access to material nonpublic information concerning the Company.
- b. Covered Transactions: This policy applies to any and all transactions in the applicable third party’s securities, including common stock, options, preferred stock, convertible debentures, warrants, and other derivative securities.

Remember that insider trading can have severe consequences, including disciplinary action, disgorgement of profits, civil penalties, criminal penalties, and jail time. It’s essential to adhere to such policies to maintain ethical standards and comply with federal securities laws.

6. Confidential Information

During your employment with Interop Technologies, and even after it ends, you must not use or disclose any Confidential Information for personal benefit or the benefit of others, except when authorized by the Company or required by law.

"Confidential Information" includes all discoveries, inventions, improvements, innovations (whether patentable or not), methods, processes, techniques, practices, software, equipment, research data, marketing and sales information, personnel data, customer lists, financial data, plans, and all other know-how, trade secrets, and information that could be useful to the Company’s competitors or harmful to the Company or its customers if disclosed, unless such information has been made publicly available.

The disclosure of any customer-related information, including customer names, transaction volumes, business strategies, and practices, is strictly prohibited. Unauthorized disclosure of customer information may violate customer contracts, privacy rights, or other laws if the information is material. You are also responsible for following policies and procedures designed to protect the Company's information assets, including Confidential Information.

7. Privacy and Personal Data Security

At Interop Technologies, protecting personal data related to individuals, including employees, customers, and business partners, is a top priority. You must take appropriate steps to ensure the security and confidentiality of personal data. You may collect, process, and transfer personal data only for legitimate business purposes and in accordance with applicable laws and regulations.

Our employees, customers, and business partners have the right to privacy regarding their personal data. This data must be collected, transported, processed, handled, and stored securely by the Company. Information privacy laws can vary by country, so it is essential to understand and comply with the laws applicable to your role and location. If you are unsure whether your data handling practices comply with these laws, you should contact the Interop Technologies communications team or legal department for guidance. More information can be found in the Data Privacy Policy on the Company's website and intranet site.

8. Gifts and Entertainment

You and your family members must not seek or accept any payments, fees, loans, services, or gifts from any individual or organization as a condition or result of conducting business with the Company. This policy does not intend to restrict, with appropriate approvals, (a) gifts of sensible value; (b) normal business meals and entertainment; (c) the exchange of customary reciprocal courtesies between employees of the Company and their business associates; and (d) similar customary and reasonable expenditures to promote general business goodwill.

You and your family members should not accept any gifts or entertainment unless the following conditions are met: (a) the gift is not in the form of cash; (b) it is consistent with customary business practices; (c) the value is reasonable and not excessive; (d) it cannot be interpreted as a bribe or payoff; and (e) it adheres to all applicable laws and regulations. If you are uncertain about the appropriateness of accepting a payment, fee, loan, service, gift, or entertainment offer, please consult with a Corporate Compliance Officer for guidance.

Expenses for gifts and entertainment for business contacts by you are also covered by this Code and must be appropriately authorized as outlined in the Company's Global Travel and Expense Policy and correctly recorded with the Company's Accounts Payable team. All gifts to business contacts, including customers, must be approved in writing.

9. Protection and Proper Use of Company Assets

You are entrusted with the responsibility to safeguard Interop Technologies' assets and ensure they are used efficiently. These assets are intended for legitimate business purposes. Limited personal use of company assets may be allowed, provided it aligns with local customs or laws and does not (a) interfere with your job responsibilities, (b) involve personal business interests or other unauthorized activities (such as promoting personal commercial ventures, political, or religious causes), or (c) result in undue costs to the Company.

10. External Public Disclosures

It is crucial that all external public disclosures made on behalf of Interop Technologies, or those intended to reflect the official position of the Company, are accurate, complete, and timely. These disclosures must accurately reflect Interop Technologies' true position on any issue and be honest and comprehensive in all material respects. To ensure our public disclosures meet these standards, we have adopted a Communications Policy available on the Company's intranet site.

You should not make any public disclosures or statements about the Company without adhering to this Policy and first contacting the Marketing and Communications department. Public disclosures include statements to the media, presentations at industry events or open

forums, and posts on your own or others' social media accounts. Additionally, all endorsements or testimonials on behalf of the Company, as well as any statements of support for industry initiatives, must comply with the Communications Policy.

11. Non-discrimination and equal employment opportunity

Equal Employment Opportunity has been, and will continue to be, a fundamental principle at Interop Technologies. We are dedicated to providing equal employment opportunities to all individuals, irrespective of race, color, religion, sex, age, national origin, marital or family status, disability, genetic information, sexual orientation, gender identity or reassignment, citizenship, pregnancy, veteran status, or any other protected characteristic as established by applicable laws.

This policy of Equal Employment Opportunity applies to all aspects of employment, including but not limited to, recruitment and hiring, placement, transfer and promotion, demotion, advertising, compensation, benefits, training, layoff or termination, participation in social or recreational functions, and all other terms and conditions of employment. Employment decisions at Interop Technologies are based solely on personal capabilities and qualifications.

We strive to maintain a work environment free from harassment and discrimination. All employees are expected to treat each other with respect and dignity. Any questions, concerns, or complaints should be addressed by following the Company's "Open Door Policy" as described in the "Communications" section of the Employee Handbook on the company's intranet website. Appropriate disciplinary action may be taken against any employee willfully violating this policy.

12. Anti-Harassment Policy

Interop Technologies is committed to providing a respectful and dignified work environment. Harassment of any form, including sexual harassment and bullying, is strictly prohibited. This policy applies to all employees, applicants, and anyone associated with the

Company, and prohibits harassment, discrimination, and retaliation both in the workplace and in any work-related settings.

For detailed information, please refer to the full Anti-Harassment Policy in the Company's employee handbook. Any questions, concerns, or complaints should be addressed following the procedures outlined in the Employee Handbook on the company's intranet website.

13. Drug and Alcohol-Free Workplace Policy

Interop Technologies is dedicated to maintaining a safe, healthy, and drug-free workplace. The use, possession, sale, or distribution of drugs and alcohol on Company property or while on duty is strictly prohibited. This policy is in place to ensure the safety and well-being of all employees.

Employees and job applicants are subject to drug testing under various circumstances, including pre-employment, reasonable suspicion, routine fitness-for-duty, and follow-up testing. Violation of this policy or positive test results may result in disciplinary action, up to and including termination.

For detailed information, please refer to the full Drug and Alcohol-Free Workplace Policy in the Employee Handbook on the company's intranet website.

14. Anti-Bribery and Corruption Policy; Money Laundering Prevention

Interop Technologies is committed to adhering to the U.S. Foreign Corrupt Practices Act (FCPA) and similar anti-bribery and anti-corruption laws in other countries. The FCPA prohibits offering, authorizing, or providing payments or other benefits to foreign officials to improperly influence their actions to obtain or retain business or secure an unfair advantage. The term "foreign official" is broadly defined to include employees of foreign state-owned enterprises.

Additionally, the FCPA mandates accurate and detailed record-keeping to ensure transparency in financial transactions. Several other countries where Interop does business

have similar laws prohibiting corrupt practices. These laws generally forbid offering or providing anything of value to customers or potential customers to influence their business decisions. Compliance with these laws is mandatory, and any suspected violations must be reported to the Company's legal department immediately.

Interop Technologies may also be held accountable for the actions of external representatives, such as sales agents, supply chain partners, independent contractors, strategic alliance partners, and other collaborators, who violate the FCPA or other anti-corruption laws. Therefore, it is crucial to select these representatives carefully, conduct thorough due diligence, and monitor their activities continuously.

The Company has established detailed procedures to mitigate the risk of violating the FCPA and other anti-corruption laws. These procedures are outlined in the Anti-Bribery and Corruption Policy, which is available on the Company's intranet site. It is your responsibility to review and comply with this Policy.

Furthermore, numerous countries, including the United States, have enacted anti-money laundering laws that prohibit accepting or transferring funds derived from criminal activities. Compliance with these laws requires appropriate due diligence regarding payments or fund transfers.

15. Transactions with Governments

Engaging in transactions with governments and government officials, whether domestically or internationally, can present unique challenges and risks compared to dealings in the private sector. These transactions often involve intricate procurement and bidding regulations specific to international, federal, state, or local governments.

It is essential that employees are fully aware of and comply with all relevant laws and regulations when conducting business with government entities. Before entering into any agreements or transactions with a government body, employees should consult with the Company's legal department to ensure adherence to all applicable rules and guidelines.

Implementation, enforcement, and acknowledgement of the Code

16. Enforcement of the Code

1. Corporate compliance officers

The General Counsel and the Human Resources Officer are the corporate compliance officers responsible for implementation of the Company's Code of Business Conduct.

2. Questions regarding the Code

You should direct questions regarding the applicability or interpretation of the Code to any of the Corporate Compliance Officers.

3. Reporting illegal or unethical conduct

It is your responsibility to report any observed or suspected illegal or unethical behavior or violations of the Code. You may contact the Corporate Compliance Officers to report observed or suspected illegal or unethical behavior or violations of the Code.

4. No Retaliation

Interop Technologies strictly prohibits any form of retaliation by or on behalf of the Company, its employees, officers, and directors against individuals who make good faith reports or complaints about violations of this Code or other illegal or unethical behavior. Anyone found engaging in retaliatory actions in response to a report made through the helpline or in accordance with the Company's Ethics Helpline Policy will face disciplinary measures, which may include termination.

5. Corrective Action and Discipline

Individuals who violate the Company's standards or the provisions of this Code may face disciplinary actions, up to and including termination, and could also be subject to civil and criminal charges. Interop Technologies is committed to promptly addressing and correcting any instances of misconduct and holding accountable those responsible.

Management may also be disciplined if they condone, fail to report, or neglect to take reasonable steps to detect misconduct, or if they fail to demonstrate proper leadership to ensure compliance. Managers with supervisory responsibilities must

take appropriate measures to ensure that disciplinary actions for their employees are fair and suitable for the situation.

17. Acknowledgement

The Company requires that all employees confirm that they have received, read, understand, and agree to abide by the Code. This confirmation occurs by the signing of the Acknowledgment Form.