

The Perryman Company Code of Business Conduct & Ethics

This Code of Business Conduct & Ethics (“**Code**”) outlines expectations for all directors, officers, employees (including full-time, part-time, temporary, contract workers, and interns regardless of their position or tenure) and agents (collectively, “**Personnel**”) of The Perryman Company (hereafter known as “**TPC**”). TPC’s reputation for integrity and excellence requires your careful observance of, and operation in full compliance with, this Code.

Compliance with Laws

Personnel shall comply with all applicable domestic and international laws, rules and regulations (collectively, “**Laws**”) including, but not limited to, Laws governing antitrust and competition, environmental health and safety, human resources and employment, anti-corruption, government contracting, data protection and privacy, and international business.

Ethical Standards & Integrity

Personnel shall:

1. Follow and comply with all company rules, policies and procedures, including the TPC Employee Handbook.
2. Refrain from any illegal, dishonest, or unethical conduct
3. Accurately record and disclose information regarding its business activities, structure, financial situation, and performance in accordance with applicable Laws.
4. Respect intellectual property rights and safeguard TPC information. The protection of confidential business information and trade secrets is vital to the interests and the success of TPC.
5. Exercise due diligence to detect, prevent and avoid instances of fraud, theft, and other forms of corruption or deception.
6. Conduct business in accordance with all applicable competition and anti-trust laws and regulations.
7. Avoid conflicts of interest or mitigate appropriately if any such conflicts arise.
8. Refrain from using non-publicly disclosed material information obtained in the course of the business relationship with TPC as the basis for trading or enabling others to trade in the stock or securities of any company.
9. Conduct business in accordance with all Laws governing export, re-export, retransfer of goods, technical data, software and services, imports, economic sanctions and embargoes, or U.S. antiboycott requirements.

Labor & Human Rights

Personnel shall:

1. Respect and treat co-workers, colleagues and stakeholders with dignity and respect.
2. Carry out all business and employment activities in line with all human rights Laws, and accordingly, shall comply with TPC's policies regarding the protection of human rights.
3. Not engage in any discrimination or harassment under any legally protected characteristics (including, but not limited to, gender, race, color, religion, ethnicity, age, sexual orientation, national origin, or disability).
4. Set working hours, wages and overtime pay in compliance with all applicable Laws.
5. Enforce policies and procedures in place to ensure that employees do not conduct work and/or job functions while under the influence of alcohol, marijuana, illegal drugs, or misused medications.
6. Respect employees' right to join or not join any lawful organization and shall comply with all applicable Laws pertaining to freedom of association and collective bargaining.
7. Undertake appropriate due diligence to identify human rights risks, supported by systems and processes to minimize the risk of human rights violations occurring and enable reporting of concerns free of retaliation.

Anti-Corruption

TPC is committed to complying with all anti-corruption Laws that prohibit bribes, kickbacks, or other corrupt actions to obtain or retain business or obtain any illegal advantage. Personnel shall:

1. Comply with TPC's policies regarding anti-corruption.
2. Not directly or indirectly solicit, receive or offer any form of bribe, kickback, or other corrupt payment, to or from any person or organization, including but not limited to government or quasi-government agencies or officials, companies or personnel of those companies.
3. Not directly or indirectly solicit, offer to or accept from any suppliers, customers or business associates any gifts or entertainment which (i) are illegal or in violation of applicable Laws; (ii) are in violation of this Code or the spirit hereof; (iii) are or, based on the facts and circumstances, could reasonably be perceived to be, a bribe, kickback or an illicit payment; or (iv) if disclosed publicly, would be detrimental to the public image of TPC.

Health & Safety

Personnel shall comply with applicable health and safety laws and regulations and any site-specific safety requirements or protocols at any TPC location or customer location. Personnel shall:

1. Take responsibility for personal health and safety, and the health and safety of your co-workers.
2. Ensure a safe work environment by following safe work procedures and protocols.
3. Participate in ongoing safety training provided by TPC.
4. Utilize applicable personal protective equipment where hazards cannot be adequately controlled by other means.
5. Minimize the impact of emergency situations through the implementation of emergency plans and response procedures.



Sustainability & Environment

Personnel shall:

1. Comply with all applicable environmental Laws and maintain all required environmental permits and registrations and follow the operational and reporting requirements of such permits.
2. Manage, control, treat and/or dispose of non-hazardous solid waste, wastewater, and/or air emissions generated from operations as required by applicable Laws before discharge.

Responsible Sourcing of Minerals and Materials

TPC endeavors to refrain from purchasing materials for use in our products that contain any Conflict Minerals that directly or indirectly finance or benefit armed groups in the Democratic Republic of the Congo or any adjoining countries. “**Conflict Minerals**” means: (i) any minerals or derivatives, which are smelted into gold, tantalum, tin or tungsten, and/or (ii) any other mineral or its derivatives determined by the US Secretary of State to be financing conflict in such countries. Personnel shall comply with TPC’s policies regarding Conflict Minerals and perform sufficient due diligence into supply chains to determine and ensure compliance with such policies.

Data Protection & Cybersecurity

Personnel shall:

1. Comply with TPC’s policies regarding data protection, privacy and cybersecurity.
2. Handle data with the utmost care, ensuring transparency, privacy and security.
3. Not expose confidential information of TPC or its Personnel in technologies, applications or programs that are not authorized by TPC or that increase the risk that such confidential information will be divulged or disclosed.
4. Use data and current and emerging technology, such as Artificial Intelligence (AI), responsibly.
5. Perform proper testing, monitoring and verification of its AI-based products or services to ensure security, quality and accuracy.

Reporting Violations of this Code

Personnel shall:

1. Report any violations of the Code to his/her supervisor (if employee is unable to or uncomfortable with reporting to supervisor, then to the TPC Director of Human Resources or General Counsel). TPC prohibits retaliation against Personnel who report violations in good faith.
2. Cooperate fully with any internal investigations.

Consequences for Violations of this Code

Violations of this Code **may** result in disciplinary action, **up to and including** termination of employment, based on the facts and circumstances surrounding the violation(s), including but not limited to, the severity or frequency of the violation(s), as determined by TPC in its sole and absolute discretion. Click on the attachment to view the employee handbook.

