

**ENVIRONMENTAL,
SOCIAL AND
GOVERNANCE
POLICY**

Environmental, Social and Governance Policy

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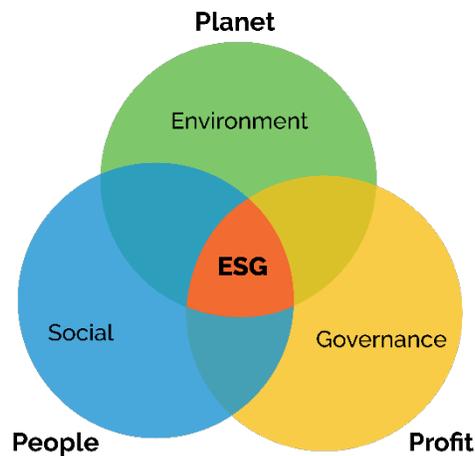
VENDOR CODE OF CONDUCT

PREAMBLE

VIRSIG’s approach to ESG is a natural extension of both our mission – to become essential to our clients by providing differentiated products and services to help them achieve their needs – and our commitment to doing what is right. We deliver value for our clients, colleagues, communities, and other stakeholders by operating intrinsically in ways that are beneficial, and which reflect positively on the communities around us, and our greater society.

VIRSIG is committed to a mission of sustainability at a corporate, culture and policy level. We hold ourselves accountable to being proactive and solution-oriented in the effort to advance sustainable, long-term growth in the world in which we live.

VIRSIG does its part to improve today’s environmental and societal challenges, by engaging with stakeholders – including clients and employees – to better serve our communities and simultaneously deliver outperformance for our company.



ENVIRONMENTAL

1. VIRSIG considers respect for the environment to be one of the central elements of the concept of sustainability, and therefore, is committed to environmental leadership in all of our business activities. Taking account of our business needs, customer requirements and the desire to minimize adverse impacts on the environment, we maintain our facilities, run our business operations, and develop products in a responsible manner. VIRSIG's primary environmental impacts relate to: the company's own energy consumption as well as the energy consumption of our hardware products; the disposition of unneeded legacy hardware products at the end of their useful life; vendor and supply chain management; business travel; and the consumption of natural resources through our own activities and our procurement processes.

2. VIRSIG, with the cooperation of our employees, customers, contractors and suppliers, is committed to environmental management through: Participating in efforts to improve environmental protection and the sharing of appropriate knowledge, methods and working practices; Monitoring and continually improving performance to help protect the environment, including pollution prevention; Managing the consumption of energy, water, paper and other resources we use in day-to-day operations; Identifying opportunities to divert, minimize, reuse and recycle our waste stream; Incorporating environmental considerations into procurement processes; Considering environmental issues when leasing or purchasing property; Striving to reduce business travel and promote alternatives wherever practicable; Keeping our internal and external stakeholders informed about VIRSIG's environment, health and safety performance; Being committed to comply with applicable environmental laws and regulations, as well as other standards to which VIRSIG subscribes; Educating our employees about the steps VIRSIG is taking to help protect the environment and providing channels for employees to contribute to our efforts; Requesting that employees report any instances of noncompliance with applicable environmental laws and regulations and conducting appropriate follow-up.

3. Further, we are committed to do and will:
 - 3.1. Be an environmentally responsible neighbor in the community where we operate, and correct incidents or conditions that endanger health, safety, or the environment. Conserve

natural resources by adopting pollution prevention practices whenever possible. Ex: deploying spill containment kits in our vehicles, to ensure no hazardous materials are unintentionally released into a public / client area which can affect the environment.

- 3.2. Develop and improve operations and technologies to minimize waste, and other pollution, minimize health and safety risks, and dispose of waste safely and responsibly.
- 3.3. Ensure the responsible use of energy throughout our business including conserving energy and improving energy efficiency when feasible.
- 3.4. Participate in efforts to improve environmental protection and understanding.
- 3.5. Meet and exceed all applicable Federal and State requirements set and adhere to stringent requirements no matter where we do business.
- 3.6. Promptly report all noncompliance issues in accordance with applicable governmental reporting requirements, evaluate causes of noncompliance, and implement corrective actions.
- 3.7. Establish procedures for periodic review of environmental compliance with all laws and regulations
- 3.8. Establish procedures to ensure all that employees are knowledgeable of, understand and comply with all applicable environmental laws and regulations.
- 3.9. Promptly correct any practice or condition not in compliance with this policy.

SUSTAINABILITY

4. VIRSIG has a corporate commitment to sustainability that ensures the company remains focused on being vigilant in protecting the environment across all of our operations. We are committed to championing environmental sustainment from administration to operations.
 - 4.1. We take our responsibilities seriously and are focused on setting and achieving higher sustainability standards each year as continue to grow and advance across the information technology and security sectors. VIRSIG aims to have its employees meet the needs of the present without compromising future generations.
 - 4.2. We are committed to ‘going green’ in our offices and encouraging energy-saving initiatives with our clients; furthermore, we have undertaken initiatives designed to reduce, reuse and recycle.
 - 4.3. We understand one of the top concerns for today’s commercial builders is indoor air quality. Therefore, on our operations side, VIRSIG strives to utilize implements with low VOC (volatile organic compound) emissions. This includes utilizing ‘green’ products whenever possible such as plastics, wire, solvents, adhesives, etc., that comply with indoor air quality emissions criteria of building is only one aspect of VIRSIG's overall sustainability program.
 - 4.4. With the help of United Parcel Service (UPS), we have gone 'carbon neutral' by offsetting our carbon emissions associated with the transportation of all of our freight.
 - 4.5. We have a commitment to taking care of the long-term social and environmental health of our company and the communities in which we operate. Inasmuch, VIRSIG is proud to be a Member of the US Green Building Council.

SOCIAL

5. VIRSIG abides by International Organization for Standardization (ISO) 26000 standards of practice. Every day we incorporate these standards toward socially responsible behavior which will have a positive impact that is relevant and significant to our mission, employees, operations, processes, customers, communities, and other stakeholders, as well as the environment.

5.1. This International Standard provides guidance on the underlying principles of social responsibility, recognizing social responsibility and engaging stakeholders, the core subjects and issues pertaining to social responsibility and on ways to integrate socially responsible behavior into the organization. This International Standard emphasizes the importance of results and improvements in performance on social responsibility.

5.2. This International Standard is intended to be useful to all types of organizations in the private, public and non-profit sectors, whether large or small, and whether operating in developed or developing countries. While not all parts of this International Standard will be of equal use to all types of organizations, all core subjects are relevant to every organization. All core subjects comprise a number of issues, and it is an individual organization's responsibility to identify which issues are relevant and significant for the organization to address, through its own considerations and through dialogue with stakeholders.

5.3. VIRSIG understands that being ISO 26000 leads to:

5.3.1. Encouraging better informed decision making

5.3.2. Strengthening its risk management practices

5.3.3. Achieving savings associated with increased productivity and resource efficiency

5.3.4. Improving stakeholder relationships

5.3.5. Attracting, hiring and retaining top talent

5.3.6. Increasing its competitive advantage including access to finance solutions

5.3.7. Promoting an organizational culture of continuous improvement and quality management

5.3.8. Achieving an enhanced reputation and strengthened credibility

5.4. ISO 26000 was first published in 2010 by the International Organization for Standardization (ISO), a specialized international agency for standardization composed of the national standards bodies of more than 160 countries. In 2016, VIRSIG adopted and applied ISO 26000 as its framework to integrate social responsibility into our daily values and practices.

DIVERSITY & INCLUSION

6. VIRSIG celebrates diversity of culture, background, experience and thought. We truly value the skills, strengths and perspectives of our diverse team. We foster a collaborative workplace that engages all team members in finding solutions for our customers that advance our common business objectives. VIRSIG's inclusive environment encourages all employees to contribute their perspectives and capabilities, and fully engages a diverse workforce in achieving superior business results. Inclusion builds trust to draw out each person's best performance and maximizes their capacity to achieve success. Respect for the individual is fundamental to building our high-performance team. All employees share the responsibility for creating a workplace that values and respects diversity and inclusion - enhanced by openness, sharing, trust, teamwork and involvement.

6.1. VIRSIG accepts and stands by the Federal Contractor Compliance Programs (OFCCP), as we do not discriminate against job applicants or our employees; and we treat both employees and applicants fairly with regard to race, color, religion, sex or national origin. VIRSIG's committed to creating and maintaining a diverse and inclusive workforce that reflects the communities in which we live and conduct business.

6.2. VIRSIG is an Equal Opportunity Employer. All qualified applicants will receive consideration for employment without regard to race, color, religion, sex, age, national origin, disability, or protected veteran status. As a Service-Disabled Veteran-Owned Business, VIRSIG understands the value veterans bring to our team. They are driven with patriotism, leadership and problem-solving skills that provide a competitive advantage, because of this, VIRSIG welcomes and encourages participation by veterans.

6.3. The VIRSIG family is made up of employees from many different ethnic groups and backgrounds.

COMMITMENT TO SAFETY

7. We recognize our employees as our most valued asset. As a result, we have developed and implemented safety policies, procedures and training designed to identify, reduce and mitigate sources of worker injury.

7.1. VIRSIG's *Safety Policy* is an internal guide that has been designed to comply with the Standards of the Occupational Safety and Health Administration (OSHA), and to endeavor to maintain a safe and injury/illness free workplace.

7.2. We understand that not only do our industry regulators and insurance carriers require a culture of proactive environmental health and safety, but that our customers, who are our reason for being, deserve no less. To this end, VIRSIG's safety policies applies to all employees, regardless of position within the company, and applies to all subcontractors and anyone who is on a company project/job site.

7.3. Our safety policies cover worksite safety practices, i.e., fall prevention, power tool safety, hazardous materials / and hazard communications, electrical safety, ladders, personal protective equipment such as respiratory protection, etc. VIRSIG maintains an assigned 'competent person' as defined as in 29 CFR 1926.32(f), that is our Safety Officer. Our Safety Officer works with the President to document and maintain injury and illness records as per OSHA and/or the Bureau of Labor Statistics, and State laws for those states in which we conduct business.

SAFE WORKING ENVIRONMENT (ANTI-VIOLENCE)

8. It is the intent of the Company to provide a safe workplace for employees and to provide a comfortable and secure atmosphere for customers, suppliers and others with whom we do business. The Company has zero tolerance for violent acts or threats of violence.

8.1. No direct, conditional or veiled threat of harm to any employee or company property will be considered acceptable behavior. This includes, but is not limited to, intimidating, threatening or hostile behaviors, physical abuse, vandalism, arson, sabotage, use of weapons, carrying weapons on Company property, or any other act, which, in

management's opinion, is inappropriate in the workplace. In addition, bizarre or offensive comments regarding violent events and/or behavior, any form of harassment, offensive joking or remarks, or any other abusive conduct or communication will not be tolerated.

- 8.2. Employees within the Company share the responsibility in identification and alleviation of threatening or violent behaviors.
- 8.3. Any employee who is subjected to or threatened with violence, or who is aware of another individual who has been subjected to or threatened with violence, should immediately report this information to their supervisor, a member of Management, or the Company's Safety Manager.
- 8.4. Employees must assume that any threat is serious and it must be immediately reported

HARRASMENT IN THE WORKPLACE

9. VIRSIG is committed to providing a work environment that is free from unlawful harassment. In keeping with this commitment, the Company maintains a strict policy prohibiting harassment, such that the Company will not engage in or tolerate any form of unlawful harassment on account of a person's membership in a Protected Class, regardless of whether the person is an applicant, employee, client, or other third party engaging with VIRSIG. This policy prohibits harassment in any form, including, but not limited to, verbal, physical, written, and visual harassment.
 - 9.1. Unlawful interference with the ability of other employees to perform their expected job duties is absolutely not tolerated. This prohibition against unlawful harassment means that individuals must not be subjected to any form of unwelcome conduct, based on membership in a Protected Class, in such a way that creates either a hostile work environment or quid pro quo harassment.
 - 9.2. "Hostile work environment" harassment occurs when unwelcome conduct based on a Protected Class is either severe or pervasive and: has the purpose or effect of creating an intimidating, hostile, or offensive work environment; has the purpose or effect of substantially and unreasonably interfering with an individual's work performance; or otherwise adversely affects an individual's employment opportunities.

- 9.2.1. “Quid pro quo” harassment occurs when unwelcome conduct is based on a Protected Class and:
- 9.2.2. Submission to or rejection of such conduct is made either explicitly or implicitly as a term; or condition of an individual’s employment; or
- 9.2.3. Submission to or rejection of such conduct is used as a basis for employment decisions.
- 9.3. Unlawful harassment includes, but is not limited to, the following conduct, behaviors, actions, and speech, when they have the effect of creating an intimidating or hostile environment as a result of another individual’s membership in any Protected Class:
 - 9.3.1. Verbal comments, such as epithets, slurs, name-calling, innuendos, stereotyping, and, jokes;
 - 9.3.2. Physical conduct, such as pranks;
 - 9.3.3. Written or graphic material on display or circulation, including e-mail jokes, photographs, messages, and offensive pictures or phrases on clothing;
 - 9.3.4. Requiring or coercing abandonment or change in religious beliefs to obtain a benefit or avoid punishment related to employment; and
 - 9.3.5. Other threatening, hostile, or intimidating acts.
- 9.4. “Sexual harassment” is generally defined under both state and federal law as unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature, resulting in either hostile work environment or quid pro quo harassment. It is illegal and against the policies of the Company for any employee, male or female, to sexually harass another employee. While a complete list of prohibited conduct does not exist, the following are examples of offensive behavior which must be avoided:
 - 9.4.1. Making unwelcome sexual advances or requests for sexual favors or other verbal or physical conduct of a sexual nature.
 - 9.4.2. Making submission to or rejection of such conduct the basis for employment decisions affecting an employee (promotions, transfers, schedules).
 - 9.4.3. Sexual epithets, lewd or off-color jokes, written or oral references to sexual conduct, gossip regarding one’s sex life, comments about an individual’s body, comments about an individual’s sexual activity, deficiencies, or prowess.
 - 9.4.4. Maintaining sexually explicit materials.

- 9.4.5. Leering, whistling, brushing up against the body, sexual gestures, or suggestive or insulting comments.
 - 9.4.6. Creating an intimidating, hostile, or offensive working environment by such conduct.
 - 9.4.7. Inquiries into one's sexual experiences or discussing one's sexual activities.
 - 9.4.8. Viewing, displaying, and/or distributing material of a sexual nature during work hours and/or via Company equipment, including computers e-mail systems, Internet, or other forms of communication.
- 9.5. Conduct is considered unlawful harassment only when it is "unwelcome." This inquiry often involves an assessment of whether the recipient made it known that the conduct was unwelcome. Remember that it is not always possible to tell whether jokes or suggestive comments are really "welcome" to another person. The best policy is to refrain from all such joking, comments or activity in the workplace and work-related settings. It is also important to understand that a third party can be offended by jokes or comments that are overheard.
- 9.6. Any unlawful harassing or discriminatory activity is unacceptable in the workplace itself and in all other work-related settings, including, but not limited to, business trips, off-site events, and business-related social events. Thus, these prohibitions against unlawful discrimination and harassment apply not only to your conduct relative to other employees, but also with respect to the manner in which you interact with others who are not VIRSIG employees but with whom you come into contact in the course of your employment. For example, this policy covers conduct toward any employee, applicant, contractor, any person who has a business, service or professional relationship with VIRSIG.
- 9.7. Any employee who believes he or she has been harassed by anyone in the workplace should report the incident immediately to management or the Company CEO. If the employee believes he or she has been harassed by a manager, the employee should report the incident to the CEO immediately. All reports of harassment will be treated seriously. The Company will conduct an impartial investigation of any complaint that could require limited disclosure of pertinent information to certain parties, including the alleged harasser. While absolute confidentiality is desired, it cannot be promised or assured throughout the course of the investigation.

- 9.8. VIRSIG will not tolerate or condone any acts of retaliation against anyone who files harassment complaints or cooperates in an investigation. Retaliating against an employee is grounds for disciplinary action, up to and including termination.
- 9.9. Any supervisor, manager, or other employee who has been found, after appropriate investigation, to have sexually harassed another employee will be subject to appropriate disciplinary action, up to and including termination. Furthermore, any manager or supervisor who is aware of harassment potentially occurring will be required to report it to VIRSIG. Any supervisor who fails to meet this expectation will be subject to disciplinary action, up to and including termination.

Bullying

- 9.10. To promote a respectful workplace, VIRSIG prohibits bullying in the workplace. Bullying is defined as any behavior that is repeated, systematic, and directed towards an employee or group of employees that a reasonable person, having regard to the circumstances, would expect to victimize, humiliate, undermine or threaten, and which creates a risk to health and safety.

Complaint and Investigation Procedure

- 9.11. If an employee believes that he or she has been subjected to or has observed unlawful discrimination, harassment, retaliation, or otherwise subjected to any unlawful conduct or conduct in violation of these policies, he or she should:
- 9.11.1. (A) Make his or her unease and/or disapproval directly and immediately known to the offending person, whenever possible and if the employee is comfortable approaching the offending person.
- 9.11.2. (B) If the situation is not immediately resolved, or if the employee is unable to or is uncomfortable with addressing the offending person directly, he or she should report the incident to management.
- 9.11.3. (C) For any concern of unlawful conduct, such as discrimination, harassment, or inappropriate sexual conduct, regardless of the seriousness, employees must report the underlying facts to management as soon as possible. Management cannot assist in stopping the problematic actions if it is unaware of the problem. Publicizing information about the perceived unlawful conduct or conduct in violation of these

policies without following the reporting procedures might be considered evidence of a vexatious intent on part of the accuser.

9.11.4. (D) If an employee is not satisfied with the response of management, the employee should speak directly to the CEO of VIRSIG. Remember that Company management cannot correct any situation that is of concern to the employee unless management knows about it. In this regard, employee cooperation is needed and appreciated.

9.12. Employees should not assume that the Company is aware of any incidents of unlawful conduct or policy violations. The Company will promptly investigate all formal and informal reports of injuries, accidents, and violations of law, Company rules, policies, and standards of conduct. The existence and nature of complaints will be disclosed only to the extent necessary to make a prompt and thorough investigation or as may be necessary to take appropriate corrective measures.

9.13. All employees are expected to fully and truthfully cooperate with Company investigations. This will ensure the Company has the ability to secure the safety of employees, customers, and facilities, and also properly address any violations. Employees who fail to provide truthful responses or who refuse to cooperate with Company investigations shall be subject to discipline. Management will take appropriate measures to investigate, resolve, remediate, prevent, or correct the situation in an expeditious manner.

9.14. Any officer, manager, supervisor, employee, subcontractor or nonemployee of the Company who, after appropriate investigation, is found to have unlawfully discriminated, harassed, retaliated against an individual who engaged in protected activity, or otherwise engaged in inappropriate or unlawful behavior in violation of these policies will be subject to appropriate corrective and/or disciplinary action, up to and including termination of employment or other relationship with the Company. The discipline will depend on various factors, including but not limited to the severity and the frequency of the offense or other conditions surrounding the incident.

GIVING BACK TO OUR COMMUNITIES

10. Giving back is a part of VIRSIG’s passion and is engrained in our corporate philosophy. Over the years, we have participated in various different causes which benefit others, and we continue to do so when the opportunity is at hand. Community engagement activities have included supporting non-profit 501(c)3 organizations, charitable sporting events, and other venues and activities of a philanthropic nature.

10.1. The importance of community engagement has become pivotal for well-functioning, twenty-first century society. Constructive relationships between communities, citizens, and the institutions of government make community engagement not only desirable, but necessary and viable as it is likely to lead to more equitable, sustainable public decisions and improve the livability of local communities. This is why community engagement is important for individuals, public organizations, private organizations, and governments alike.

10.2. VIRSIG’s corporate culture aims to inspire and encourage our employees to volunteer in their respective communities, to donate to worthwhile charitable causes, and to donate their time to causes of importance to them; all of these efforts help further and benefit society. Our positive activities are highlighted on our www.VIRSIG-CARES.org website, and those employees are praised and valued for their altruistic and charitable efforts and accomplishments.

COMMITMENT TO HUMAN RIGHTS

11. VIRSIG strives to support those who support others. This applies when we are working on formal projects, and when it comes to corporate philanthropic and charitable causes which help our local communities. Giving back is a part of VIRSIG's passion and is ingrained in our corporate philosophy. Over the years, we have participated in various different causes, some with a human rights mission, and we will continue to do so when the opportunity is at hand.

11.1. As VIRSIG is committed to offering its clients, technology products that have been developed and manufactured by domestic and international market leaders, we often partner with international companies. VIRSIG ensures that any products it offers will always remain consistent with both U.S. national security and foreign policy objectives, as well as being committed to respecting internationally recognized human rights principles throughout our global operations.

11.2. Our commitment to Human Rights reflects our longstanding dedication to the preservation of basic rights and human dignity in our workplace and beyond. VIRSIG holds human rights to be an essential component of our business. We support internationally recognized human rights principles that promote and protect human rights. The applies to our operations and affiliates in all assets we own and operate. We use due diligence as a means to identify and prevent human rights risks to people in our business. Where we have identified adverse human rights impacts resulting from or caused by our business activities, we are committed to provide for or cooperate in, their fair and equitable remediation. Our policy and actions aim to conform with, and be guided, by the following standards and policies:

- A. The United Nations Universal Declaration of Human Rights (UDHR);
- B. The United Nations Guiding Principles on Business and Human Rights (UNGPR);
- C. The International Covenant on Civil and Political Rights;
- D. Intl. Labor Organization's Declaration on Fundamental Principles and Rights at Work;
and
- E. The OECD Guidelines for Multinational Enterprises.

11.3. While we recognize that governments are ultimately responsible for establishing the legal framework to protect human rights within their jurisdictions, we at VIRSIG will do our part, and remains committed to respecting recognized human rights principles aimed at promoting and protecting human rights in the countries in which we operate. This policy complements our Core Values, specifically “People Matter” which is intrinsic to the company’s philosophy, and they are championed by both our leadership and our employees. Our Core Values are a set of principles which set the tone of our character as a company, and guide us in our work ethic and conduct. These Core Values are important not just during work hours, but also when we as members of our communities are out there supporting those communities and others.

GOOD GOVERNANCE

12. VIRSIG believes that good governance is essential to creating and preserving value for our clients, employees and our community. This includes an intrinsic sound approach to corporate governance that complies with all applicable laws, rules, regulations, and policies as well as unwavering adherence to our *Core Values*.

12.1. Our Core Values are intrinsic to the company's philosophy, and they are championed and practiced by both our leadership and our employees. These are a set of principles which set the tone of our character as a company and guide us in our work ethic and conduct. These Core Values are important not just during work hours, but also when we as members of our communities are out there supporting those communities and others; they include:

12.2. PEOPLE MATTER: "I will think about my teammates, my clients, their staff and will make sure they are taken care of..."

12.3. DO THE RIGHT THING: "This not only happens when someone is looking, but also when no one is looking" I will do what I know is right..."

12.4. ENDLESS PURSUIT OF EXCELLENCE: "I will ask myself if we can do better..."

12.5. LONG TERM VERSUS SHORT TERM: "Instead of focusing on what impact my actions will have in this moment, I will also think about the impact my actions will have in the long term..."

12.6. BE HEROIC! "I will strive to save the day. Every day..."

12.7. NEVER GIVE UP: "No matter what happens, I will persevere. I will ask for support when needed, and always fight on..."

ETHICAL BEHAVIOR

13. Our leadership and all employees, including senior management, are committed to conduct themselves in accordance with the highest moral and ethical standards. As a company, VIRSIG strives to ensure a fair workplace for our employees as well as partners with whom we do business. We have and respect strict policies to protect against unlawful discrimination and harassment. We have an Open-Door Policy to encourage honest and direct communication to resolve issues and concerns in an expeditious manner.

Ethics In Financial Matters

13.1. VIRSIG is dedicated to keeping accurate fiscal books and records that reflect transactions and asset dispositions in reasonable detail, supported by a proper system of internal accounting controls. These requirements are implemented through VIRSIG's standard accounting rules and procedures, which all personnel are required to follow without exception.

13.2. Misleading, incomplete or false entries in VIRSIG's books and records are never acceptable. VIRSIG monitors for employees, agents and consultants, with particular attention to "red flags" that may indicate possible legal or ethical violations. Due diligence ordinarily will include appropriate reference and background checks, written contract provisions that confirm a business partner's responsibilities, and appropriate monitoring controls. Personnel working with agents and other third parties should pay particular attention to unusual or suspicious circumstances that may indicate possible legal or ethics concerns, commonly referred to as "red flags." The presence of red flags in a relationship or transaction requires greater scrutiny and implementation of safeguards to prevent and detect improper conduct. Appointment of an agent or other third party ordinarily requires prior approval by an appropriate senior manager, description of the nature and scope of services provided in a written contract, and appropriate contractual safeguards against potential violations of law or VIRSIG policy.

13.3. This policy imposes on all personnel specific responsibilities and obligations that will be enforced through standard disciplinary measures and properly reflected in personnel evaluations as necessary. All officers, employees and agents are responsible for

understanding and complying with the policy, as it relates to their jobs. Every employee has an obligation to:

- 13.3.1. Be familiar with applicable aspects of the Policy and communicate them to subordinates;
- 13.3.2. Ask questions if the Policy or action required to take in a particular situation is unclear;
- 13.3.3. Properly manage and monitor business activities conducted through third parties;
- 13.3.4. Be alert to indications or evidence of possible wrongdoing; and
- 13.3.5. Promptly report violations or suspected violations to the company Chief Executive Officer and/or Executive Director forthwith.

13.4. Any employee who has reason to believe that a violation of this policy has occurred, or may occur, must promptly report this information to his or her supervisor, or the next level of supervision. Retaliation in any form against an employee who has, in good faith, reported a violation or possible violation of this policy is strictly prohibited. Employees who violate this Policy will be subject to disciplinary action, up to and including dismissal. Violations can also result in prosecution by law enforcement authorities and serious criminal and civil penalties. Any additional questions or concerns will be addressed through VIRSIG's legal counsel by the executive leadership as needed.

Ethics In Cross-Border Business

13.5. When it comes to cross-border international business, VIRSIG builds on our Core Values. Our activities start with a simple proposition—we always act with integrity and we always act in compliance with the law. Besides being the right thing to do and protecting VIRSIG, acting with integrity and in compliance with laws improves our performance and reflects on our character as a business—to our clients, our business partners, and the public at large—and enables us to attract and retain top talent. All employees of the company have a personal responsibility to act ethically and comply with the laws of all jurisdictions in all countries we operate in. Violations break trust with VIRSIG and our clients and may result in individual disciplinary action, up to and

including termination of employment, and perhaps legal liability. In some cases, VIRSIG may have a legal or other obligation to report the results of an investigation to the appropriate law enforcement authorities or may otherwise choose to do so.

- 13.6. Our Core Values and ethics are global and consistent. We recognize that some business cultures have practices that may violate our Core Values and ethics, such that upholding them may be uncomfortable, even challenging. Doing the right thing often requires courage. Saying no to these practices does not mean we disrespect those cultures. It's also our responsibility to understand a client's code of conduct in addition to following our own Core Values. There may be restrictions on, for example, gifts, entertainment, etc., that are more limiting than our own, and if so, we follow them in connection with the client engagement.

Mitigating Conflicts of Interest

- 13.7. Sometimes it is a regional or cultural custom to provide a gift, or expect a gift. That said, our employees are prohibited from engaging in any business or conduct or entering into any agreement or arrangement that would give rise to actual or potential conflicts of interest. They are advised to avoid situations where they are placed in a position that might give rise to the appearance that a conflict of interest has arisen. This includes something such as accepting an expensive gift from a client, vendor, supplier, or other stakeholder which could create a conflict of interest—whether it was intended or not. We understand that appearance of impropriety can damage our business, reputation, and bottom line. Inasmuch, we strive to mitigate against anything that will raise questions about the company's intentions or integrity.

- 13.8. Further, a conflict of interest may develop when the private interests of a person interfere in any way with their interests of the Company as a whole. A conflict can arise when they take actions or have interests that may make it difficult to perform their work for the Company objectively and effectively. Conflicts of interest may also arise when they, or members of their family, receive improper personal benefits as a result of their position with the Company. For example, loans to their family members from a

competitor, customer or supplier are clear conflicts of interest. Furthermore, it is almost always a conflict of interest for employees to work simultaneously for a competitor, customer or supplier. A conflict of interest is deemed to exist whenever, due to the nature of their responsibilities or their relationship with the Company, they are in a position to further any personal financial interest or the financial interest of any member of their family.

- 13.9. On occasion, a client’s code of conduct may appear to contradict our Core Values. When this occurs, we will discuss it with the client—for example, it may include requirements we cannot follow (because of practical limitations on how we do business) or provisions that do not apply to us. When faced with such situations, we will discuss with the client as appropriate and seek to comply with the spirit or key principles of its code, while always following our Core Values.

Obeying the Law of Various Countries

- 13.10. Obeying the law, both in letter and in spirit, is the foundation on which our ethical standards are built, and ethical conduct often means going beyond the letter of the law. While performing our duties, we must comply with applicable governmental laws, rules and regulations at all levels of government in the United States, the United Kingdom, European Union, Canada, and other locations in which VIRSIG does business. Although we are not expected to know the details of all these laws, it is important to know enough to determine when to seek advice.

International Export Control

- 13.11. Export control can impose prohibitions, restrictions, approvals from authorities or other monitoring measures on the cross-border exchange of goods. These provisions under export control legislation apply to technologies and software as well as other goods. Apart from exports per se, export controls may also apply to the temporary cross-border transfer of, for instance, objects and technical drawings taken on a business trip, or technical transmissions by e-mail or cloud.
- 13.12. Furthermore, any business with persons or companies named in sanctions lists is strictly prohibited, regardless of the delivery process. When making a decision concerning

the import or export of products and services, VIRSIG will consciously examine whether the decision may fall under export control. When in doubt, we will seek advice from the appropriate agency or government department responsible for customs and international trade law.

Anti-Bribery Policy

- 13.13. VIRSIG is committed to conducting its business in compliance with all applicable laws and regulations, including the U.S. Foreign Corrupt Practices Act (FCPA), the United Kingdom Bribery Act (UKBA) and similar laws in other countries that prohibit improper payments to obtain a business advantage. VIRSIG's policy prohibiting bribery and other improper payments in the conduct of VIRSIG business operations and employee responsibilities for ensuring implementation of the Policy.
- 13.14. We strictly prohibit bribery or other improper payments in all of our business operations. This prohibition applies to all of our business activities, anywhere in the world, whether involving government officials or other commercial enterprises. A bribe or other improper payment to secure a business advantage is never acceptable and can expose individuals and VIRSIG to possible criminal prosecution, reputational harm, or other serious consequences.
- 13.15. Each officer and employee of VIRSIG has a personal responsibility and obligation to conduct VIRSIG's business activities ethically and in compliance with all applicable laws based on the US States and international countries wherein VIRSIG does business. Failure to do so may result in disciplinary action, up to and including dismissal. Improper payments prohibited by this policy include bribes, kickbacks, excessive gifts or entertainment, or any other payment made or offered to obtain an undue business advantage. These payments should not be confused with reasonable and limited expenditures for gifts, business entertainment and other legitimate activities directly related to the conduct of VIRSIG's business.

VENDOR CODE OF CONDUCT

14. We seek to be transparent and require the same of those we work with. Further, VIRSIG is committed to working with suppliers who are open and honest with us. Our suppliers are requested to maintain complete and accurate records and information so compliance can be effectively assessed.

14.1. Together with our partners, we are fully compliant. Our suppliers must commit to comply with all applicable local, national, and international laws, standards, ethics, and regulations relevant to their business operations.

14.2. We monitor our suppliers for ongoing compliance, and we seek to develop strong ties with all our manufacturing facilities. As part of that relationship, VIRSIG reserves the right to conduct inspections of all manufacturing facilities. To maintain their relationship with us, our suppliers are responsible for:

- A. Ensuring the requirements in this Code are understood and implemented at every level;
- B. Maintaining all documentation necessary to demonstrate compliance with this Code;
- C. Allowing VIRSIG representatives full access to facilities, documents, and workers; and
- D. Submitting an improvement plan to address any issues of noncompliance that may be found during the course of compliance inspections.
- E. VIRSIG may terminate its business relationship with any supplier who is unwilling or unable to comply with the provisions set forth herein.

14.3. All workers must be of the legal working age and our suppliers must comply with all applicable child labor laws and must not employ workers younger than the local legal working age. Further, if the age for completing compulsory education or the minimum working age in the country for manufacturing jobs is older than the local legal working age, workers must be of the older minimum working age, even if otherwise permitted by local law. Suppliers must comply with all other applicable child labor laws, and workers under the age of 18 shall not perform work that may jeopardize their health or safety.

14.4. We are against the use of forced labor. Our suppliers shall ensure that all employment is voluntary and free from violence, threats, financial penalties, or coercion. There shall be no restrictions on movement or withholding of personal documents or

deposits. The suppliers must take adequate steps to ensure workers are not trafficked or otherwise exploited.

- 14.5. We are against discrimination in all forms and strongly encourage VIRSIG suppliers not to discriminate in employment practices, including recruitment, hiring, compensation, training, benefits, advancement, termination, or retirement on the basis of race, color, ancestry, national or social origin, religion, gender, marital status, age, sexual orientation, disability, political opinion, or any other personal characteristics or beliefs. All workers must be treated with respect and dignity.
- 14.6. All workers must be compensated and benefited at the local industry standard. VIRSIG suppliers must comply with all applicable laws and regulations relating to wages and benefits. Workers shall be paid at least the minimum wage or a wage that is consistent with prevailing local industry standards, whichever is higher. Overtime work shall be compensated at the premium rate as is legally required and not exceed maximum hours mandated by local law. Compensation must be provided at least monthly and should be provided without illegal or inappropriate deductions or penalties.
- 14.7. Our suppliers must comply with all applicable laws and regulations relating to hours of work. Workers shall not be required to work more than the maximum hours mandated by local law (including overtime).
- 14.8. All workers should have the right to an open means of communication. Our suppliers are encouraged to recognize and respect the rights of workers to freedom of association and collective bargaining. Where such rights are not provided by law, suppliers should take steps to provide an open means of communication with workers.
- 14.9. Health and safety are of the utmost importance, and insomuch suppliers must comply with all applicable laws and regulations governing workplace health and safety. Suppliers shall provide their workers with a clean, safe, and healthy work and living environment.

These ESG Policy was adopted on July 1, 2021,
and is subject to revisions, by:

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