



LEGAL NOTICE

Code of Business Ethics

The standards of conduct Assivo expects of its personnel, and the limits of what this Code is and does.

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Article I. Purpose, Status, and Interpretation

Section 1.01 Purpose

This Code of Business Ethics (this "Code") states the standards of conduct that Assivo, Inc. ("Assivo") expects of its directors, officers, employees, and individual contractors ("Personnel") in the conduct of Assivo's business.

Section 1.02 Status of This Code

This Code is a statement of expectations adopted by Assivo for its own purposes. It is not a contract of employment or engagement, does not alter the at-will or other status of any Personnel, does not create any right, duty, or obligation enforceable by any Personnel, client, supplier, or other Person, and is not a representation or warranty to anyone about the conduct of Assivo or its Personnel. No Person is a third-party beneficiary of this Code. Nothing in this Code creates a duty of care owed by Assivo to any Person.

Section 1.03 Not a Guarantee of Conduct

Assivo cannot guarantee that every Personnel will comply with this Code in every instance. Publication of this Code is not a representation that any particular control, procedure, or level of compliance exists, and a failure by any Personnel to observe this Code does not give rise to any claim against Assivo.

Section 1.04 Relationship to Law, Agreements, and Policies

Where this Code and applicable law differ, law governs. Where a written agreement between Assivo and a client, supplier, or other Person addresses a matter, the agreement governs that relationship. This Code is supplemented by Assivo's internal policies, which are confidential and may be more specific.

Section 1.05 Interpretation, Waiver, and Amendment

Assivo interprets this Code in its sole discretion. Only the Principal of Assivo may waive a provision of this Code, and any waiver must be in writing and applies only to the matter for which it is given. Assivo may amend or withdraw this Code at any time without notice. The version published at the address shown on the cover of this document is the authoritative version, and any other copy is superseded by it.

Section 1.06 Definitions

- (a) **"Assivo"** means Assivo, Inc. and each other member of the Assivo Group, and **"Assivo Group"** means Assivo, Inc. together with its present and future parents, subsidiaries, affiliates, branches, and delivery entities in any jurisdiction, and their respective successors and assigns.
- (b) **"Anything of Value"** includes cash, cash equivalents, gifts, meals, entertainment, travel, employment, favors, charitable contributions, and any other benefit.
- (c) **"Confidential Information"** means non-public information of Assivo or of any client, supplier, or other Person that Assivo has received in confidence.
- (d) **"Government Official"** includes any officer, employee, or agent of any government, government-owned or controlled entity, public international organization, or political party, and any candidate for public office.
- (e) **"Person"** means any individual or entity.

Article II. Compliance With Law

Personnel are expected to comply with the laws, regulations, and professional rules that apply to their work in each jurisdiction in which they work or that their work affects, including laws on anti-corruption, competition, data protection, employment, health and safety, sanctions and export control, securities, and tax. Ignorance of a law is not an excuse. Personnel who are unsure whether a law applies are expected to ask.

Article III. Anti-Corruption

Section 3.01 Prohibition

Personnel must not, directly or through any Person, offer, promise, give, request, or accept Anything of Value to or from any Person, including any Government Official, in order to obtain or retain business, influence a decision, or secure any improper advantage.

Section 3.02 Facilitation Payments

Facilitation or "grease" payments are not permitted, regardless of local practice.

Section 3.03 Third Parties

Personnel must not use agents, consultants, or intermediaries to do what this Article prohibits, and are expected to take reasonable care in engaging third parties that interact with Government Officials on Assivo's behalf.

Section 3.04 Books and Records

All payments and receipts must be accurately recorded. No undisclosed or unrecorded account or fund may be established for any purpose.

Article IV. Gifts, Hospitality, and Courtesies

Personnel may give or receive business courtesies only where they are lawful, modest in value, infrequent, transparent, given openly, consistent with ordinary business practice, and not intended or likely to influence a decision. Cash, cash equivalents, and courtesies to or from Government Officials are not permitted without prior written approval under Assivo's internal policy.

Article V. Conflicts of Interest

Section 5.01 Standard

Personnel are expected to act in Assivo's interest in the conduct of Assivo's business and to avoid any situation in which a personal, financial, or family interest could conflict with, or reasonably appear to conflict with, that duty.

Section 5.02 Examples

Conflicts may arise from a financial interest in a client, supplier, or competitor; outside employment, directorships, or consulting; business dealings with relatives or close associates; use of Assivo's opportunities, property, or information for personal benefit; or a personal relationship with a Person that Personnel supervise or with whom they contract on Assivo's behalf.

Section 5.03 Disclosure

Personnel are expected to disclose actual or potential conflicts to their manager or to ethics@assivo.com and to comply with any direction Assivo gives.

Article VI. Fair Dealing and Competition

Personnel are expected to deal fairly and honestly with clients, suppliers, competitors, and colleagues. Personnel must not misrepresent facts, make false or disparaging statements about competitors, obtain competitor information by improper means, or enter into any agreement or understanding with a competitor regarding prices, terms, markets, customers, employees, or bids.

Article VII. Confidential Information and Data Protection

Section 7.01 Protection

Personnel are expected to protect Confidential Information, to use it only for Assivo's business and as permitted by the applicable agreement, to disclose it only to Persons authorized to receive it, and to continue to protect it after their engagement with Assivo ends.

Section 7.02 Client Data

Client data is accessed, used, copied, retained, and disclosed only as permitted by the applicable client agreement, the client's instructions, and applicable law, and not otherwise.

Section 7.03 Personal Information

Personnel are expected to handle Personal Information in accordance with applicable data protection law, Assivo's Privacy Policy, and Assivo's internal policies.

Section 7.04 Information of Others

Personnel must not bring to Assivo, or use in Assivo's business, confidential information belonging to a former employer or any other Person without authorization.

Article VIII. Assivo Property, Systems, and Records

Personnel are expected to use Assivo's property, systems, funds, and information for Assivo's business, to protect them from loss and misuse, to keep accurate and complete records, and to retain and dispose of records in accordance with Assivo's internal policy and any legal hold.

Article IX. Workplace Conduct

Assivo seeks to provide a workplace in which Personnel are treated with respect and that is free from unlawful discrimination, harassment, and retaliation, and to comply with the employment, labor, and safety laws of each place in which it operates. Personnel are expected to treat colleagues, clients, and others professionally and to comply with Assivo's internal workplace policies.

Article X. Communications and Public Statements

Only Personnel authorized by Assivo may speak for Assivo to the press, on social media, or in public. Personnel must not use Assivo's name, marks, or Confidential Information in personal communications, and must make clear that personal views are their own.

Article XI. Political and Charitable Activity

Assivo does not make political contributions in any jurisdiction. Personnel may take part in political and charitable activity in their personal capacity, on their own time, at their own expense, and without using Assivo's name, resources, or facilities.

Article XII. Sanctions and Trade

Personnel must not cause Assivo to transact with any Person or in any country in violation of applicable sanctions, export control, or anti-boycott laws.

Article XIII. Raising Concerns

Section 13.01 Reporting

Personnel who become aware of conduct that may violate this Code or applicable law are expected to report it to their manager, to another manager, or to ethics@assivo.com. Reports may be made anonymously where local law permits.

Section 13.02 No Retaliation

Assivo does not permit retaliation against any Personnel for raising a concern in good faith or for cooperating with an investigation. Making a report that the reporter knows to be false is itself a violation of this Code.

Section 13.03 Investigation and Response

Assivo may investigate any report in the manner it considers appropriate, may involve outside counsel or advisers, and expects Personnel to cooperate. Assivo determines in its discretion what action, if any, to take, which may include discipline up to and including termination, and referral to authorities. Assivo has no obligation to report to the reporter on the outcome.

Section 13.04 Protected Activity

Nothing in this Code prohibits any Personnel from reporting possible violations of law to a governmental authority, or from making other disclosures protected by law, or requires notice to Assivo before doing so.

Article XIV. Acknowledgment

Assivo may require Personnel to acknowledge this Code and to complete training. Acknowledgment confirms receipt and understanding; it does not create a contract.

Article XV. Contact

Assivo, Inc.

Attention: Ethics

444 West Lake Street, Suite 1700, Chicago, Illinois 60606

ethics@assivo.com

Outside Counsel

Legal inquiries concerning this Code of Business Ethics may be directed to Assivo's outside counsel. This does not replace any notice address specified in this document.

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Contacting counsel through this document does not create an attorney-client relationship between Neal, Gerber & Eisenberg LLP and the person making contact. Counsel represents Assivo, Inc. only. Routine inquiries may also be sent to hello@assivo.com.

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