



INTEGRITY FOR LIFE

Code of Ethics and Business Conduct



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Welcome to the Code

At Vytalogy, we set a high bar for everything we do: the quality of our products, how we show up for our consumers, and how we treat each other every day. Our purpose is clear—to fuel a life of ultimate wellness for all, nurturing the mind, body, and spirit. And we are the ones who will make Vytalogy the ultimate wellness company.

Our Code of Ethics and Business Conduct is the foundation for how we operate—together, with integrity, every day. It reflects our values and helps each of us navigate the decisions, situations, and challenges we encounter in our work. Whether you're new to Vytalogy or have been here for years, this Code belongs to all of us.

When we are connected to our purpose and to each other, doing the right thing comes naturally. I believe in a Vytalogy where every person feels empowered to speak up, take ownership, and bring their best. That's what our Code asks of each of us, not because we have to, but because it's who we are.

Please read this Code carefully and use it as your guide. If something doesn't look right, say something. We take all concerns seriously, and we will never tolerate retaliation against anyone who raises a concern in good faith. Thank you for being part of this team, and for your commitment to doing things the right way.

Onward & Upward,

Craig Shiesley

Chief Executive Officer



What We Believe

Our Purpose

Fuel a life of ultimate wellness for all.

Our Mission

To deliver science-backed wellness solutions that make a transformative impact by addressing the most important wellness needs of our consumers with a focus on proactive, holistic, lifelong wellness for mind, body, and spirit.

Our Values

Stronger Together

No egos, no silos. We get better results and have more fun when we work as a team.

Own It

We take charge, challenge what's not working, bring forward new ideas, and are responsible for the end result.

Courage & Grit

It's not always easy, and that's the point. We are resilient, have heart, and keep going no matter what.

Get It Done

We plan it, execute it, and crush it—with clear communication and trust in each other.

Be Real

We show up as ourselves—real people, real talk. We treat each other with kindness and keep it honest.

Truly Purposeful

We do work that means something to us, our teams, and our communities. It starts with taking care of ourselves so we can give our best to others.



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Our Code

Getting Started

Vytalogy is all about grabbing life by the horns, pouring all our energy into living well and working with passion and integrity. There’s no doubt that we love what we do. You can see it in the quality of our products and in our growing consumer base. They’re loyal to us for a reason it’s because we don’t let them down. We deliver on our promises.

Every day, we have a chance to do even more by making our world a better, healthier place. It’s a tall order but is something we can achieve when we work together and put our best into our daily work. We’re at our best when we live and work by our Code of Ethics and Business Conduct (“Code”), which shows us how to follow Vytalogy’s policies and the many laws that apply to us.

This Code summarizes our key policies and certain laws that apply to our business. It does not address every situation. If you need any more detail, refer to Vytalogy’s Employee Handbook and our company policies, or reach out to any of the resources listed in this Code.

Make it your go-to guide at work. You’ll find it’s a resource that’s always there to help you:

- Uphold Vytalogy’s high standards of ethical conduct.
- Navigate common ethical situations you could encounter in your work.
- Avoid anything that might appear improper in connection with our business.
- Find help when the answers aren’t clear.

Complying With Laws and Regulations

Vytalogy Wellness is committed to compliance with all laws, rules, and regulations that apply to our business. It is impossible to anticipate every question you may have or situation you might face so, in addition to the Code, Vytalogy also has other resources that can be of help. These additional resources are listed throughout the Code. As always, we rely on you to use good judgment and to seek help when you need it.

We operate coast-to-coast in the United States, but we sell into international markets too, so it’s important to be aware of different laws and customs that may apply.

While we respect the norms of our customers, business partners, and coworkers, all employees must, at a minimum, comply with the standards and principles in this Code. If any provision of our Code conflicts with a local law or requirement, you should seek guidance from the Legal Department.

Waivers and Amendments to the Code

On rare occasions, limited waivers of the Code may be necessary. Any waiver of this Code for directors or executive officers may be made only by the CEO or Board of Directors.

Accountability and Discipline

Violating our Code, our policies, or the law or encouraging others to do so, exposes our company to liability and puts our reputation at risk. If you see or suspect a violation, [report it](#).

Anyone who violates our Code will be subject to disciplinary action, up to and including termination of their employment with Vytalogy. You should also understand that violations of laws or regulations may also result in legal proceedings and penalties including, in some circumstances, criminal prosecution.





Our Code

Who Must Follow Our Code

All employees of Vytalogy and its subsidiaries, including executives, corporate officers, and members of our Board of Directors, are required to read, understand, and follow our Code.

Consultants, contractors, agents, suppliers, vendors, and temporary employees (“business partners”) who serve as an extension of Vytalogy are also expected to follow the spirit of our Code, as well as any applicable contractual provisions.

If you supervise our business partners, you are responsible for communicating our standards and ensuring that they are understood. If a business partner fails to meet our ethics and compliance expectations or their related contractual obligations, it may result in the termination of their contract.



It’s Up to You

Each of us has an obligation to act with integrity, even when this means making difficult choices. Meeting this obligation is what enables us to succeed and grow.

Employee Responsibilities

Every employee has a responsibility to:

- Act in a professional, honest, and ethical manner when conducting business on behalf of our company.
- Know the information in our Code and company policies and pay particular attention to the topics that apply to your specific job responsibilities.
- Complete all required employee training in a timely manner and keep up-to-date on current standards and expectations.
- Report concerns about possible violations of our Code, our policies, or the law to your supervisor or manager, an executive, or any of the resources listed in this Code.
- Cooperate and tell the truth when responding to an investigation or audit, and never alter or destroy records in response to an investigation or when an investigation is anticipated.

Additional Responsibilities of Supervisors and Managers

Vytalogy supervisors and managers are expected to meet the following additional responsibilities:

- Lead by example. As a supervisor or manager, you are expected to exemplify high standards of ethical business conduct and help create a work environment that values mutual respect and open communication.
- Be a resource for others. Communicate often with employees and business partners about how the Code and other policies apply to their daily work.
- Be proactive. Look for opportunities to discuss and address ethical dilemmas and challenging situations with others.
- Delegate responsibly. Never delegate authority to any individual whom you believe may engage in unlawful conduct or unethical activities.
- Respond quickly and effectively. When a concern is brought to your attention, ensure that it is treated seriously and with due respect for everyone involved.
- Be aware of the limits of your authority. Do not take any action that exceeds your authority. If you are ever unsure of what is appropriate (and what isn’t), discuss the matter with your supervisor or manager.

Remember: No reason, including the desire to meet business goals, should ever be an excuse for violating our Code, our policies, or the law.

What If?

I’m a manager and not clear on what my obligations are if someone comes to me with an accusation and what if it involves a senior manager?

No matter who the allegation involves, you must report it. Vytalogy provides several avenues for reporting concerns. If, for any reason, you are uncomfortable making a report to a particular person, you may talk to Human Resources or use any of the other resources listed in the Code or Employee Handbook.





Our Code

Making Good Decisions

Making the right decision is not always easy. There may be times when you’ll be under pressure or unsure of what to do. Always remember that when you have a tough choice to make, you’re not alone. There are resources available to help you.

Facing a difficult decision? It may help to ask yourself:



Is it legal?



Is it consistent with our Code and our values?



Would I feel comfortable if the senior management and others in my Company knew about it?



Would I feel comfortable if my decision or my actions were made public?

If the answer to all of these questions is “**yes**,” the decision to move forward is probably okay, but if the answer to any question is “**no**” or “**I am not sure**,” stop and seek guidance.

Remember, in any situation and under any circumstances, it is always appropriate to ask for help.

One More Thing...

We value your feedback. If you have suggestions for ways to enhance our Code, our policies, or our resources to better address a particular issue you have encountered, bring them forward. Promoting an ethical Vytalogy is a responsibility we all share.



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Our Code

Sharing Concerns

If you see or suspect any violation of our Code, our policies, or the law or if you have a question about what to do, talk to your supervisor or manager.

If you're uncomfortable speaking with your supervisor or manager, there are other resources available to help you:

- Contact Human Resources at HR@vytalogy.com
- Contact the Legal Department at legal@vytalogy.com
- Contact the Vytalogy Hotline:
Mobile:
[Vytalogy.navexone.com](https://vytalogy.navexone.com)

Online:
[Vytalogy.ethicpoint.com](https://vytalogy.ethicpoint.com)

Phone:
833-246-2822

Vytalogy will make every reasonable attempt to ensure that your concerns are addressed appropriately. Please see Vytalogy's Employee Handbook for more details on the complaint reporting process.

What to Expect When You Use the Vytalogy Hotline

The Hotline web portal and phone line are available 24 hours a day, seven days a week. Trained specialists from an independent third-party provider of corporate compliance services will answer your call, document your concerns, and forward a written report to Vytalogy for further investigation.

When you contact the Hotline, you may choose to remain anonymous where permitted by local law. All reports received will be treated equally, whether they are submitted anonymously or not.

After you make a report, you will receive an identification number so you can follow up on your concern. Following up is especially important if you have submitted a report anonymously, as we may need additional information in order to conduct an effective investigation. This identification number will also enable you to track the resolution of the case; however, please note that out of respect for privacy, Vytalogy will not be able to inform you about individual disciplinary actions.

Any report you make will be kept confidential by all individuals involved with reviewing and, if necessary, investigating it.

Remember, an issue cannot be addressed unless it is brought to someone's attention.



What If?

I believe someone has misused the Hotline, made an anonymous call, and falsely accused someone of wrongdoing. What should I do?

Report your concern immediately. Experience has shown that the Vytalogy Hotline is rarely used for malicious purposes, but it is important to know that we will follow up on reports, and anyone who uses the Hotline in bad faith to spread falsehoods or threaten others or with the intent to unjustly damage another person's reputation, will be subject to disciplinary action.



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Our Code

No Retaliation

We will not tolerate any retaliation against any employee who, in good faith, asks questions, makes a report of actions that may be inconsistent with our Code, our policies, or the law, or who assists in an investigation of suspected wrongdoing.

Reporting “in good faith” means making a genuine attempt to provide honest, complete, and accurate information, even if it later proves to be unsubstantiated or mistaken.



What If?

I suspect there may be some unethical behavior going on in my business unit involving my manager. I know I should report my suspicions, and I’m thinking about using the Vytalogy Hotline, but I’m concerned about retaliation.

You are required to report misconduct and, in your situation, using the Hotline is a good option. We will investigate your suspicions and may need to talk to you to gather additional information. After you make the report, if you believe you are experiencing any retaliation, you should report it. We take claims of retaliation seriously. Reports of retaliation will be thoroughly investigated and, if they are true, retaliators will be disciplined.



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Our Workplace

Appreciating Our People and Respecting Each Other

Our coworkers and consumers come from a wide variety of backgrounds, cultures, and experiences. Vytalogy sees value in the uniqueness of every individual who works at and with our company. Our goal is for everyone to feel they belong and that their perspective, voice, and talent can contribute to our shared mission of fueling a life of ultimate wellness for all. When people feel respected and valued, we do better work together.

We are committed to equal employment opportunity and prohibit discrimination based on race, color, religion, gender, sexual orientation, national origin, age, disability, veteran status, marital status, or any other characteristic protected by law. Everyone at Vytalogy—colleagues, job applicants, and business partners—deserves to be treated fairly and with respect.

Employment decisions are based solely on qualifications, demonstrated skills, and achievements—never on personal characteristics. We believe that teams with diverse viewpoints make better decisions and that an environment of inclusion helps drive the innovation our consumers depend on.

✓ Do the Right Thing

- Treat others respectfully and professionally.
- Make fair, objective employment decisions based on qualifications and performance. Seek out different perspectives and help create an environment where everyone can contribute and thrive.
- Do not discriminate against others on the basis of any other characteristic protected by law or company policy.

⚠ Watch Out For

- Comments, jokes, or materials, including emails, which others might consider offensive.
- Inappropriate bias when judging others. If you supervise others, assess them on performance. Use objective, quantifiable standards and avoid introducing unrelated considerations into your decisions.



What If?

One of my coworkers sends emails containing jokes and derogatory comments about certain nationalities. They make me uncomfortable, but no one else has spoken up about them. What should I do?

You should notify your supervisor or manager or Human Resources. Sending these kinds of jokes violates our values as well as our policies that relate to the use of email and our standards on diversity, harassment, and discrimination. By doing nothing you are condoning discrimination and tolerating beliefs that can seriously erode the team environment that we have all worked to create.



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Our Workplace

Respectful Workplace

We all have the right to work in an environment that is free from intimidation, harassment, bullying, and abusive conduct. Verbal or physical conduct by any employee that harasses another, disrupts another’s work performance, or creates an intimidating, offensive, abusive, or hostile work environment will not be tolerated.

Sexual Harassment

A common form of harassment is sexual harassment, which in general occurs when:

- Actions that are unwelcome are made a condition of employment or used as the basis for employment decisions, such as a request for a date, a sexual favor, or other similar conduct of a sexual nature.
- An intimidating, offensive, or hostile environment is created by unwelcome sexual advances, insulting jokes, or other offensive verbal or physical behavior of a sexual nature.



Do the Right Thing

- Promote a positive attitude toward policies designed to build a safe, ethical, and professional workplace.
- Help each other by speaking out when a coworker’s conduct makes others uncomfortable.
- Demonstrate professionalism. Do not visit inappropriate internet sites or display sexually explicit or offensive pictures.
- Report all incidents of harassment and intimidation that may compromise our ability to work together and be productive.



Watch Out For

- Threatening remarks, obscene phone calls, stalking, or any other form of harassment.
- Sexual harassment or other unwelcome verbal or physical conduct of a sexual nature.
- The display of sexually explicit or offensive pictures or other materials.
- Sexual or offensive jokes or comments (explicit or by innuendo) and leering.
- Verbal abuse, threats, or taunting.



What If?

While on a business trip, a colleague of mine repeatedly asked me out for drinks and made comments about my appearance that made me uncomfortable. We weren’t in the office and it was after regular working hours, so I wasn’t sure what I should do. Was that harassment?

Yes, it was. This type of conduct is not tolerated, not only during working hours but in all work-related situations, including business trips. Tell your colleague such actions are inappropriate and must be stopped, and if they continue, report the problem.



Learn More

Please see Vytalogy’s Policy Prohibiting Harassment, Discrimination, and Retaliation (within the Employee Handbook) for more details on our policies and procedures.



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Our Workplace

Health and Safety at Work

Ensuring safety is an integral part of everything we do. Each of us is responsible for acting in a way that protects ourselves and others. No matter what job you do or where you do it, we count on every employee to actively promote a safe and healthy workplace, and report any situations that may pose a health, safety, or security risk.

Reporting risks and hazards is not just the right thing to do, it's a requirement, because a failure to speak up about an incident or to participate in an investigation into an incident can have serious repercussions for you, for our company, and for every employee on the job, every day. Do your part to keep everyone in the Vytalogy family injury-free.



Alcohol and Drugs

While at work or on Vytalogy business:

- You should be always ready to carry out your work duties—never impaired.
- Do not use, possess, or be under the influence of illegal drugs or any substance that could interfere with a safe and effective work environment or harm our company's reputation.

Workplace Violence

Violence of any kind has no place at Vytalogy. We will not tolerate:

- Intimidating, threatening, or hostile behavior.
- Causing physical injury to another.
- Acts of vandalism, arson, sabotage, or other criminal activities.
- The carrying of firearms or other weapons onto company property unless you are authorized to do so.

✓ Do the Right Thing

- Follow the safety, security, and health rules and practices that apply to your job.
- Maintain a neat, safe working environment by keeping workstations, aisles, and other workspaces free from obstacles, wires, and other potential hazards.
- Notify your supervisor or manager immediately about any unsafe equipment or any situation that could pose a threat to health or safety or damage the environment. As an employee, you have the right and the responsibility to stop any work if you feel your safety is at risk.
- Cooperate with any investigations into incidents.

⚠ Watch Out For

- Unsafe practices or work conditions.
- Carelessness in enforcing security standards, such as facility entry procedures and password protocols.

☰ Learn More

Please see Vytalogy's Employee Handbook for details on Vytalogy's policies relating to Health & Safety, Weapons in the Workplace, and Violence in the Workplace, as well as the Vytalogy Injury & Illness Prevention Program.

💬 What If?

I've noticed some practices in my area that don't seem safe. Who can I speak to? I'm new here and don't want to be considered a troublemaker.

Discuss your concerns with your supervisor or manager or [Human Resources](#). There may be very good reasons for the practices, but it's important to remember that raising a concern about safety does not make you a troublemaker but a responsible employee concerned about the safety of others.

A subcontractor has committed a violation of our standards. Are subcontractors expected to follow the same health, safety, and security policies and procedures as employees?

Absolutely. Supervisors and managers are responsible for ensuring that subcontractors and other business partners at work on Vytalogy premises understand and comply with all applicable laws and regulations governing the particular facility as well as with additional requirements our company may impose.





Our Company

Use of Company Assets

Each of us is entrusted with company assets—the resources we own (whether tangible or intangible) that enable us to operate. We are personally responsible for using them with care and protecting them from fraud, waste, and abuse. Personal use of company assets is discouraged, but where permitted, should be kept to a minimum and have no adverse effect on productivity and the work environment.

Physical and Electronic Assets

Physical assets include Vytalogy facilities, materials, and equipment. Electronic assets include computer and communication systems, software, and hardware. Files and records are also company assets, and we have a responsibility to ensure their confidentiality, security, and integrity.

Be aware that any information you create, share, or download onto company systems belongs to Vytalogy, and we have the right to review and monitor system use at any time, without notifying you, to the extent permitted by law.



Do the Right Thing

- Use company assets to carry out your job responsibilities, never for activities that are improper or illegal.
- Observe good physical security practices, especially those related to badging in and out of our facilities.
- Be a good steward of our electronic resources and systems, and practice good cybersecurity:
 - Do not share passwords or allow other people, including friends and family, to use Vytalogy resources.
 - Only use software that has been properly licensed. The copying or use of unlicensed or “pirated” software on company computers or other equipment to conduct company business is strictly prohibited. If you have any questions about whether or not a particular use of software is licensed, contact the IT Department.
 - Lock your workstation when you step away and log off our systems when you complete your work for the day.
 - Beware of phishing attempts. Use caution in opening email attachments from unknown senders or clicking on suspicious links.



Watch Out For

- Requests to borrow or use Vytalogy equipment without approval.
- Excessive use of Vytalogy resources for personal purposes.
- Unknown individuals without proper credentials entering our facilities.



Learn More

Please see Vytalogy’s Employee Handbook for additional details on Vytalogy’s policies and procedures relating to Company Property, Confidential and Personal Information, and Technology Use & Security.



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Our Company

Confidential Information and Intellectual Property

Vytalogy relies on each of us to be vigilant and protect confidential information and intellectual property that are some of our most important and valuable assets. This means keeping this information secure, limiting access to those who have a need to know in order to do their job, and only using it for authorized purposes.

Be aware that your obligation to restrict your use of Vytalogy confidential information and intellectual property continues even after your employment ends.

Do the Right Thing

- Promptly disclose to company management any inventions or other IP that you create while you are employed by Vytalogy.
- Properly label confidential information to indicate how it should be handled, distributed, and destroyed.
- Use and disclose confidential information only for legitimate business purposes.
- Protect our intellectual property and confidential information by sharing it only with authorized parties.
- Only store or communicate company information using Vytalogy information systems.

Intellectual Property

Examples of intellectual property (IP) include:

- Business and marketing plans
 - Company initiatives (existing, planned, proposed, or developing)
 - Customer lists
 - Trade secrets and discoveries
- Methods, know-how, and techniques
 - Innovations and designs
 - Systems, software, and technology
 - Patents, trademarks, and copyrights

Vytalogy commits substantial resources to our technology development and innovation, and the creation and protection of our intellectual property rights are critical to our business. Contact the [Legal Department](#) if you receive questions regarding:

- The scope of intellectual property rights
- The applicability of Vytalogy rights to another company’s products
- The applicability of a third party’s intellectual property rights to Vytalogy intellectual property rights or products

Watch Out For

- Discussions of Vytalogy confidential information in places where others might be able to overhear, for example, on planes and elevators and when using phones.
- Sending confidential information to unattended devices or printers.

Learn More

Please see Vytalogy’s Employee Handbook for additional details on Vytalogy’s policies and procedures relating to Confidential and Personal Information.





Our Company

Conflicts of Interest

A conflict of interest can occur whenever you have a competing interest or activity that may interfere with your ability to make an objective decision on behalf of Vytalogy. Each of us is expected to use good judgment and avoid situations that can lead to even the appearance of a conflict because the perception of a conflict can undermine the trust others place in us and damage our reputation.

Conflicts of interest may be actual, potential, or even just a matter of perception. Since these situations are not always clear-cut, you need to fully disclose them to your supervisor or manager so that they can be properly evaluated, monitored, and managed.

Do the Right Thing

- Avoid conflict of interest situations whenever possible.
- Always make business decisions in the best interest of Vytalogy.
- Think ahead and proactively address situations that may put your interests or those of a family member in potential conflict with Vytalogy.
- Discuss with your supervisor or manager full details of any situation that could be perceived as a potential conflict of interest.

Be alert to situations, including the following, which are common examples of potential conflicts of interest:

Corporate opportunities

If you learn about a business opportunity because of your job, it belongs to Vytalogy first. This means that you should not take that opportunity for yourself unless you get approval from the [Chief Human Resources Officer](#).

Friends and relatives

On occasion, it is possible that you may find yourself in a situation where you are working with a close friend or relative who works for a customer, business partner, competitor, or even our company. Since it is impossible to anticipate every scenario that could create a potential conflict, you should disclose your situation to your supervisor or manager to determine if any precautions need to be taken.

Outside employment

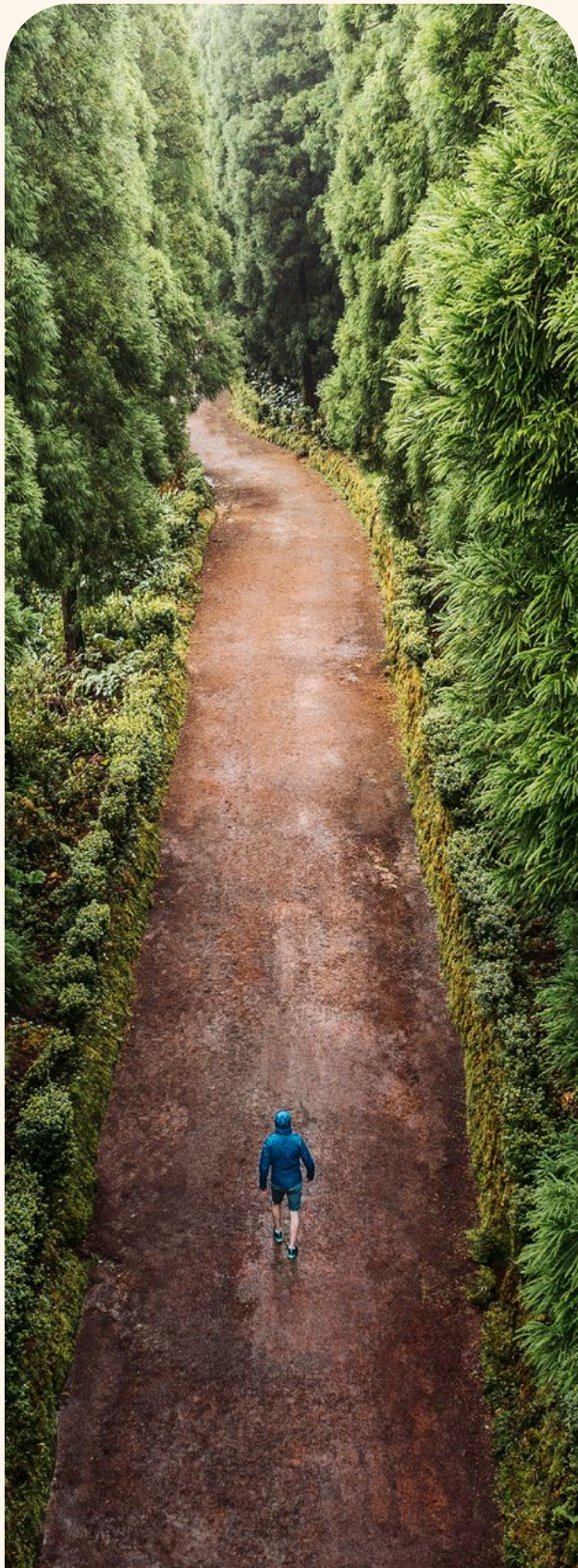
To ensure that there are no conflicts and that potential issues are addressed, you always need to disclose and discuss outside employment with your supervisor or manager. If approved, you must ensure that the outside activity does not interfere with your work at Vytalogy. Working for a competitor, business partner, or customer may raise conflicts that will need to be resolved. Also, any approved side or personal business should not compete with Vytalogy.

Personal investments

A conflict can occur if you have a significant ownership or other financial interest in a competitor, business partner, or customer. Make sure you know what's permitted, and what's not, by our policies and seek help with any questions.

Civic activities

Unless company management specifically asks you to do so, you shouldn't accept a seat on the board of directors or advisory board of any of our competitors, business partners, or customers, especially if your current job gives you the ability to influence our relationship with them.



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Our Company

Responsible Communications

Vytalogy is committed to maintaining honest, professional, and lawful internal and public communications.

We need a consistent voice when making disclosures or providing information to the public. For this reason, each of us must help the company ensure that only authorized persons speak on behalf of Vytalogy. Refer any communications with the media, investors, stock analysts, and other members of the financial community to executive management.

Watch Out For

- Giving public speeches or writing articles for professional journals or other public communications that relate to Vytalogy without appropriate management approval.
- The temptation to use your title or affiliation outside of your work for Vytalogy without it being clear that the use is for identification only.
- Invitations to speak “off the record” to journalists or analysts who ask you for information about Vytalogy or its customers or business partners.

Learn More

Please also see Vytalogy’s Employee Handbook for policies and procedures relating to Social Media Guidelines.



Full, Fair, and Timely Disclosures

Vytalogy is committed to meeting its obligations of full, fair, and timely disclosure in all reports and documents that describe our business and financial results and other public communications.

Social Media

Be careful when writing communications that might be published online. If you participate in internet discussion groups, chat rooms, bulletin boards, blogs, social media sites, or other electronic communications, even under an alias, never give the impression that you are speaking on behalf of Vytalogy.

If you believe a false statement about our company has been posted, do not post or share nonpublic information, even if your intent is to “set the record straight.” Your posting might be misinterpreted, start false rumors, or may be inaccurate or misleading. Instead, contact [Human Resources](#).

Ethical Marketing and Advertising

Vytalogy’s advertising and promotion efforts focus on conveying truthful and useful information to customers and consumers. We stand behind everything we say and promote our products only for uses that have been approved or authorized by appropriate government or regulatory agencies (e.g., we don’t promote in the United States a use that has been approved by another country’s government but not the U.S. government). Our product claims are grounded in scientific evidence and government-approved labeling rules in all countries where we operate.



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Our Company

Product Safety and Quality

We develop our products with consumers in mind and are dedicated to ensuring they receive safe, high-quality products. Our commitment to safety and quality has allowed us to earn the trust of consumers around the world.

How We Inspire Trust

We deliver on our promises and ensure that we meet the highest standards by:

- Innovating our processes and operations everywhere we do business.
- Following the most stringent guidelines applicable.
- Testing our products to ensure that only those of the highest quality reach the market.
- Evaluating the performance of our products throughout their life to ensure quality and reliability.

Do the Right Thing

- Help Vytalogy continue producing quality products by always making consumer safety a priority, adhering to the highest standards, and never sacrificing quality to meet a company target or deadline.
- If you see or suspect activity that goes against our commitment, speak up and contact the [Legal Department](#).



What If?

I think there may be an issue with one of the manufacturing processes at my facility, but we are behind schedule and if I say anything, we will be delayed further as the company investigates. What should I do?

Vytalogy never sacrifices quality to meet a deadline or target. You should report the matter immediately.

Third-party Relationships

Vytalogy evaluates and engages with qualified business partners on an objective basis grounded in fairness. When selecting partners, we assess their ability to satisfy our business and technical needs and requirements. We also make purchasing decisions based on the long-term cost and benefit to Vytalogy.

All agreements are negotiated in good faith and must be fair and reasonable for both parties. Do your part to hold our business partners to our high standards and ensure they operate ethically, in compliance with the law, and in a way that’s consistent with our Code, our policies, and our Values.



Data Privacy

We respect the personal information of others. Follow our policies and all applicable laws and regulations in collecting, accessing, using, storing, sharing, and disposing of sensitive information. Only use it, and share it with others outside of Vytalogy, for legitimate business purposes.

Make sure you know the kind of information that is considered personal information. It includes anything that could be used to identify someone, either directly or indirectly, such as a name, email address, phone number, or credit card number.

Watch Out For

- Failing to shred or securely dispose of sensitive information.
- Using “free” or individually purchased internet hosting, collaboration, or cloud services that could put personal information at risk.





Our Responsibilities

Fair Competition

We believe in free and open competition and never engage in practices that may limit competition or try to gain competitive advantages through unethical or illegal business practices. Antitrust laws are complex and compliance requirements can vary depending on the circumstances, so seek help with any questions about what is appropriate and what isn't.

Do the Right Thing

- Do not enter into agreements with competitors or others to engage in any anti-competitive behavior, including setting prices or dividing up customers, suppliers, or markets.
- Do not engage in conversations with competitors about competitively sensitive information.
- Be careful when accepting information from third parties. You should know and trust their sources and be sure that the information they provide is not protected by trade secret laws, nondisclosure, or confidentiality agreements.
- Respect the obligations of others to keep competitive information confidential, including former employees of competitors, who are obligated not to use or disclose their former employer's confidential information.

Acquiring Business Intelligence

Information about competitors is a valuable asset in today's competitive business environment, but in collecting business intelligence, you and others working on our behalf, must always live up to the highest ethical standards. Obtain competitive information only through legal and ethical means, never through fraud, misrepresentation, deception, or the use of technology to "spy" on others. Sharing competitively sensitive information with competitors (whether that information belongs to us or our business partners) is always prohibited.

In general, the following activities are red flags, should be avoided, and, if detected, reported to the [Legal Department](#).

- Sharing our company's competitively sensitive information with a competitor
- Sharing competitively sensitive information of business partners or other third parties with their competitors
- Attempting to obtain nonpublic information about competitors from new hires or candidates for employment

Watch Out For

- Collusion—when companies secretly communicate or agree on how they will compete. This could include agreements or exchanges of information on pricing, terms, wages, or allocations of markets.
- Bid-rigging—when competitors or service providers manipulate bidding so that fair competition is limited. This may include comparing bids, agreeing to refrain from bidding, or knowingly submitting noncompetitive bids.
- Tying—when a company with market power forces customers to agree to services or products that they do not want or need.
- Predatory pricing—when a company with market power sells a service below cost to eliminate or harm a competitor, with the intent to recover the loss of revenue later by raising prices after the competitor has been eliminated or harmed.
- Using anyone else's confidential information without appropriate approvals.

- Using job interviews as a way of collecting confidential information about competitors or others.
- Receiving suggestions from third parties for new products, product features, or services when the source of the original idea is not fully known.

What If?

I received sensitive pricing information from one of our competitors. What should I do?

You should contact the [Legal Department](#) without delay and before any further action is taken. It is important, from the moment we receive such information, that we demonstrate respect for antitrust laws, and we make it clear that we expect others to do the same. This requires appropriate action that can only be decided on a case-to-case basis and may include sending a letter to the competitor.





Our Responsibilities

Anti-bribery and Anti-corruption

We believe that all forms of bribery and other corrupt practices are an inappropriate way to conduct business regardless of local customs. Vytalogy is committed to complying with all applicable anti-corruption laws.

We do not pay or accept bribes or kickbacks, at any time for any reason. This applies equally to any person or firm who represents our company.

It is especially important that we exercise due diligence and carefully monitor third parties acting on our behalf. We carefully screen all business partners who work on our behalf, particularly when dealing in countries with high corruption rates and in any situations where “red flags” would indicate further screening is needed before retaining the business partner. Our partners must understand that they are required to operate in strict compliance with our standards and to maintain accurate records of all transactions. We never ask them to do something that we are prohibited from doing ourselves.

Key Definitions

Bribery means giving or receiving anything of value (or offering to do so) in order to obtain a business, financial, or commercial advantage.

Corruption is the abuse of an entrusted power for private gain.

Facilitation payments are typically small payments to a low-level government official that are intended to encourage them to perform their responsibilities.

Government officials include government employees, political parties, candidates for office, employees of public organizations, and government-owned entities.

✓ Do the Right Thing

- Understand the standards set forth under anti-bribery laws which apply to your role at Vytalogy.
- Never give anything of value inconsistent with local laws and regulations to any government official. If you are not sure of the local laws, the safest course of action is to not give anything of value.
- Accurately and completely record all payments to third parties.

⚠ Watch Out For

- Apparent violations of anti-bribery laws by our business partners.
- Agents who do not wish to have all terms of their engagement with Vytalogy clearly documented in writing.

💬 What If?

A foreign customs official has detained importing some of our product due to incorrect paperwork but has offered to release the goods for a small payment. The official told me this is customary in this country. Is this allowed?

No, it isn't. You need to fix the paperwork before doing anything else. Providing money, gifts or entertainment to the foreign official would likely be a bribe and a violation of the law. Reach out to the [Legal Department](#) if you need additional guidance.





Our Responsibilities

Gifts and Entertainment

A modest gift may be a thoughtful “thank you,” or a meal may offer an opportunity to discuss business. If not handled carefully, however, the exchange of gifts and entertainment could be improper or create a conflict of interest. This is especially true if an offer is extended frequently or if the value is large enough that someone may think it is being offered in an attempt to influence a business decision.

Only offer and accept gifts and entertainment that comply with our policies, and make sure that anything given or received is accurately reported in our books and records.

Be aware that the rules for what we may give to, or accept from, government officials are much more strict. Don't offer anything of value to a government official without obtaining approval, in advance, from the Chief Legal Officer. And remember that we do not accept or provide gifts, favors, or entertainment to anyone, even if it complies with our policies, if the intent is to improperly influence a decision.



Do the Right Thing

- Only provide and accept gifts and entertainment that are reasonable complements to business relationships.
- Never offer gifts to, or accept them from, a business partner with whom you are involved in contract negotiations.
- Make sure that anything given or received complies with the company policies of both the giver and the recipient.
- Never give or accept cash or cash equivalents.
- Do not request or solicit personal gifts, favors, entertainment, or services.
- Raise a concern whenever you suspect that a colleague or business partner may be improperly attempting to influence a decision of a customer or government official.



Watch Out For

- Situations that could embarrass you or our company (for example, entertainment at sexually oriented establishments).
- Gifts, favors, or entertainment that may be reasonable for a privately owned company but not for a government official or agency.



What If?

When traveling, I received a gift from a business partner that I believe was excessive. What should I do?

You need to let your supervisor or manager know or the [Legal Department](#) as soon as possible. We may need to return the gift with a letter explaining our policy. If a gift is perishable or impractical to return, another option may be to distribute it to employees or donate it to charity, with a letter of explanation to the donor.



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Our Responsibilities

Global Trade

Vitalogy has global operations that support a growing, worldwide customer base. To maintain and grow our global standing, we must strictly comply with all applicable laws that govern the import, export, and re-export of our products, and also with the laws of the countries where our products are manufactured, repaired, or used. Any violation of these laws, even through ignorance, could have damaging and long-lasting effects on our business.

If your responsibilities include exporting products or receiving imported products, you are responsible for screening customers, suppliers, and transactions to ensure that we comply with all applicable export and import requirements.

Anti-boycott Regulations

We are subject to the anti-boycott provisions of U.S. law that require us to refuse to participate in foreign boycotts that the United States does not sanction. We promptly report any request to join in, support, or furnish information concerning a non-U.S.-sanctioned boycott.



Do the Right Thing

- Obtain all necessary licenses before the export or re-export of products, services, or technology.
- Report complete, accurate, and detailed information regarding every imported product, including its place(s) of manufacture and its full cost.
- Direct any questions you have regarding imports or exports of our products, parts, or technology to the [Legal Department](#).



Watch Out For

- Transferring technical data and technology to someone in another country, such as through email, conversations, meetings, or database access. This restriction applies to sharing information with coworkers, as well as non-employees.
- Transporting company assets that contain certain technology (such as a computer an associate takes on a business trip) to another country.



What If?

My work requires regular interaction with customs officials. As part of my job, I am routinely asked to provide the Customs Service with information about our imports and exports. Do I really need to contact the Legal Department prior to each and every submission of information to the government?

The right approach here would be to discuss with the [Legal Department](#) the types of requests your department routinely receives from Customs. These routine requests, once understood, might be handled without any legal review. Extraordinary requests would still require Legal Department review to ensure that you are responding accurately, fully, and in accordance with the law.



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Our Responsibilities

Financial Integrity

The accuracy and completeness of our disclosures and business records are essential to making informed decisions and supporting investors, regulators, and others. Our books and records must accurately and fairly reflect our transactions in sufficient detail and in accordance with our accounting practices and policies.

Some employees have special responsibilities in this area, but all of us contribute to the process of recording business results or maintaining records. Ensure that the information we record is accurate, timely, complete, and maintained in a manner that is consistent with our internal controls, disclosure controls, and legal obligations.

Records Management

Documents should only be disposed of in compliance with Vytalogy policies and should never be destroyed or hidden. You must never conceal wrongdoing or permit others to do so. Never destroy documents in response to, or in anticipation of, an investigation or audit.

If you have any questions or concerns about retaining or destroying corporate records, please contact the [Legal Department](#).

Anti-money Laundering

Money laundering is a global problem with far-reaching and serious consequences. It is defined as the process of moving funds made from illegal activities through a legal business to make them appear legitimate. Involvement in such activities undermines our integrity, damages our reputation, and can expose our company and the individuals involved to severe sanctions.

We are committed to conducting business in a way that prevents money laundering and complying with all anti-money laundering, financial crimes, and anti-terrorism laws wherever we operate. Report any suspicious financial transactions and activities to the Legal Department and, if required, to appropriate government agencies.



Do the Right Thing

- Create business records that accurately reflect the truth of the underlying event or transaction. Be guided by the principles of transparency and truthfulness.
- Write carefully in all of your business communications. Write as though someday the records you create may become public documents.



What If?

At the end of the last quarter reporting period, my manager asked me to record additional expenses, even though I had not yet received the invoices from the supplier and the work has not yet started. I agreed to do it, since we were all sure that the work would be completed in the next quarter. Now I wonder if I did the right thing.

No, you didn't. Costs must be recorded in the period in which they are incurred. The work was not started and the costs were not incurred by the date you recorded the transaction. It was, therefore, a misrepresentation and, depending on the circumstances, could amount to fraud.



Watch Out For

- Records that are not clear and complete or that obscure the true nature of any action.
- Undisclosed or unrecorded funds, assets, or liabilities.
- Improper destruction of documents.
- Attempts to pay in cash or in a different currency than shown on the invoice.
- Requests to ship to a country that differs from where payment originated.
- Avoidance of recordkeeping requirements.
- Payments made by someone who is not a party to the transaction.
- Unusual changes to a customer's normal pattern of transactions.



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Our Communities

Human Rights

We conduct our business in a manner that respects the human rights and dignity of all, and we support international efforts to promote and protect human rights, including an absolute opposition to slavery and human trafficking.

Each of us can help support efforts to eliminate abuses such as child labor, slavery, human trafficking, and forced labor.



Do the Right Thing

- Report any suspicion or evidence of human rights abuses in our operations or in the operations of our suppliers.
- Remember that respect for human dignity begins with our daily interactions with one another, our business partners, and our customers. It includes promoting diversity and doing our part to protect the rights and dignity of everyone with whom we do business.



What If?

When I was visiting a new supplier, I noticed employees working there who seemed underage. When I asked about it, I didn't get a clear answer. What are my next steps?

You did the right thing first to be on the lookout for human rights abuses and second to raise the issue with our supplier. The next step is to report the incident to the [Legal Department](#). We are committed to human rights and to the elimination of human rights abuses including child labor.



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Our Communities

Political Activities

Each of us has the right to voluntarily participate in the political process, including making personal political contributions. However, you must always make it clear that your personal views and actions are not those of Vytalogy, and never use company funds, time, or the Vytalogy name for any political purpose without proper authorization.

✓ Do the Right Thing

- Ensure that your personal political views and activities are not viewed as those of the company.
- Do not use our resources or facilities to support your personal political activities.
- Follow all federal, state, local, and foreign election laws, rules, and regulations as they relate to company contributions or expenditures.

⚠ Watch Out For

- Lobbying. Interactions with government officials or regulators that could be seen as lobbying must be discussed in advance and coordinated with the [Legal Department](#).
- Pressure. Never apply direct or indirect pressure on another employee to contribute to, support, or oppose any political candidate or party.
- Improper influence. Avoid even the appearance of making political or charitable contributions in order to gain favor or in an attempt to exert improper influence.
- Conflicts of interest. Holding or campaigning for political office must not create, or appear to create, a conflict of interest with your duties at Vytalogy.



What If?

I will be attending a fundraiser for a candidate running for local office. Is it OK to mention my position at Vytalogy as long as I don't use any company funds or resources?

No. It would be improper to associate our name in any way with your personal political activities.

I would like to invite an elected official to speak at an upcoming company event. Would that be a problem?

You must get approval from the [Legal Department](#) before inviting an elected official or other government official to attend a company event. If the invitee is in the midst of a reelection campaign, the company event could be viewed as an endorsement of the candidate. Depending on local laws, any food, drink, or transportation provided to the invitee could be considered a gift. In most cases, there would be limits and reporting obligations.





Our Communities

Environmental Stewardship and Sustainability

We recognize our environmental and societal responsibilities. We are committed to sustainability and to minimizing damage to the environment as well as any potential harm to the health and safety of employees, customers, and the public.



✓ **Do the Right Thing**

- Protect employee safety and the environment. Read and understand all the information provided by our company that is relevant to your job and operate in full compliance with environmental, health, and safety laws and regulations.
- Fully cooperate with environmental, health and safety training, and with our company’s periodic compliance reviews of our products and operations.
- Stop work and report any situation that you believe could result in an unsafe working condition or damage to the environment.
- Provide complete and accurate information in response to environmental, health, and safety laws, regulations, and permits.
- Be proactive and look for ways by which we can minimize waste, energy, and use of natural resources.

Contact our [Chief Human Resources Officer](#) or the [Legal Department](#) if you have any questions about compliance with environmental, health and safety laws, and policies.

Community Support

Corporate social responsibility is an integral part of Vytalogy’s culture. We believe in making a positive difference in people’s lives and engaging responsibly in charitable activities to make a positive impact in the communities where we live and work. As a company, we contribute funds, time, and talent to support company-wide programs and local causes. We encourage (but do not require) you to participate in the many initiatives we support.

Vytalogy also encourages you to make a difference on a personal level, supporting charitable and civic causes that are important to you. Be sure your activities are lawful and consistent with our policies and that you’re participating on your own time and at your own expense. Never pressure your colleagues to participate and unless you receive approval in advance, please do not use Vytalogy funds, assets, or the Vytalogy name to further your personal volunteer activities.





Find Help

This Code does not answer every question. If you need additional guidance, or are unsure what to do, please reach out to any of the resources below. No issue is too small to raise, and we are always here to help.

- **Human Resources:**
HR@vitalogy.com
- **Vitalogy Hotline**
Mobile:
[Vitalogy.navexone.com](https://vitalogy.navexone.com)

Online:
[Vitalogy.ethicpoint.com](https://vitalogy.ethicpoint.com)

Phone:
833-246-2822
- **The Legal Department:**
legal@vitalogy.com



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