

United by Our Values

— Code of Business Ethics
and Employee Conduct



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Letter From Leadership

For over four decades, we have focused on the importance of enhancing lives. We proudly provide the thermal shipping solutions needed to help ensure patients around the world have access to viable, life-enhancing pharmaceuticals.

However, we bring more to patients than our essential products and services. We bring a dedicated team committed to doing the right thing, the right way. Each of us takes pride in our purpose and accomplishments but know that what matters most is how we achieve them.

For us, it all starts and ends with our Values: curiosity, humility, transparency, accountability and maintaining our entrepreneurial spirit. They guide our decisions and frame who we are as an organization. Our Code of Business Ethics and Employee Conduct (“Code”) is a critical resource in understanding our Values and how we apply them to our everyday work.

Read our Code carefully and apply it in your everyday decision- making process. When we each operate from the same set of Values, we maintain our reputation, which is one of our most important assets as an organization. Take responsibility for protecting it, and we will continue providing patients peace of mind for decades to come.

Yours truly,



Patrick Schafer
Chief Executive Officer CSafe



“United by Our Values”



Mission, Vision, Promise and Values

Remember the Purpose

Mission

To provide **peace of mind through** our offering of best-in-class temperature management solutions for the delivery of life-enhancing products.

Vision

We will be the **indispensable** global partner for the successful delivery of temperature-sensitive, life-enhancing products.

Promise

We are committed to **protecting** what matters most to you so patients can receive what matters most to them.

Values

We will operate with a shared set of **principles that guide our behavior** which include curiosity, humility, transparency, accountability and maintaining our entrepreneurial spirit.



Introduction

Overview

What does it mean to be a part of the CSafe (also referred to as “we,” “us” and “our”) team? It means when it comes to patient needs, we deliver; and we remain **United by Our Values** every step along the way.

CSafe employees must do their part by acting with integrity in every action and interaction, and making decisions that reflect who we are and what we stand for as an organization.

Our Code of Business Ethics and Employee Conduct (“Code”) is our employees’ most important resource in this effort. It is designed with them in mind – a vital resource that will help them:

- Comply with applicable laws, regulations and organization policies.
- Promote integrity and ethical conduct.
- Address common ethical situations they could encounter in their work.
- Avoid even the appearance of anything improper in connection with CSafe’s business activities.

Complying With Laws and Regulations

CSafe is committed to compliance with all laws, rules and regulations that apply to our business. It is impossible to anticipate every question an employee may have or situation an employee might face so, in addition to the Code, CSafe also has other resources that can be of help. Some of these additional resources are listed in the Code and others are available upon request from [Human Resources](#) or [Legal](#). As always, we rely on employees to use good judgment and seek help when they need it.

We operate in multiple countries, 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 throughout the world, 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, employees should seek guidance from their manager, [Human Resources](#) or [Legal](#).



Introduction

Who Must Follow This Code

All employees of DoubleDay Acquisitions, LLC (dba CSafe) and its subsidiaries (collectively referred to as “CSafe”), including senior leadership, are required to read, understand and follow our Code.

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

Employees who supervise our business partners 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.

Accountability and Discipline

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

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



Introduction

Responsibilities

Each employee has an obligation to act with integrity, even when this means making difficult choices. Meeting this obligation is what enables growth and success.

Employee Responsibilities

Every employee has a responsibility to:

- Act in a professional, honest and ethical manner when conducting business on behalf of CSafe.
- Know the information in our Code and organization policies and pay particular attention to the topics that apply to each individual employee's 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 their manager, [Human Resources](#), [Legal](#), senior leadership 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 Managers

CSafe managers are expected to meet the following additional responsibilities:

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

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



Introduction

Making Good Decisions

Making the right decision is not always easy. There may be times when employees will be under pressure or unsure of what to do. They should always remember that when they have a tough choice to make, they are not alone. There are resources available to help.

One More Thing ...

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

Facing a Difficult Decision?

It may help the employee to ask himself or herself:

- Is it legal?
- Is it consistent with our Code and our Values?
- Would the employee feel comfortable if senior leadership and others within CSafe knew about it?
- Would the employee feel comfortable if his/her decision or actions were made public?

If the answer to all of these questions is “**yes**,” the decision to move forward is probably OK, but if the answer to any question is “**no**” or “**not sure**,” stop and seek guidance. In any situation, under any circumstances, it is always appropriate to [ask for help](#).



Introduction

Speaking Up

If employees see or suspect any violation of the Code, CSafe's policies or the law, or if they have a question about what to do, they should talk to their manager. If they are uncomfortable speaking with their manager, there are other resources available to help. They should:

- Contact another member of management.
- Contact [Human Resources](#), [Legal](#) or senior leadership.
- Contact the [Hotline](#).

CSafe will make every reasonable attempt to ensure that their concerns are addressed appropriately.

What to Expect When Using the 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 all calls, document all concerns and forward a written report to CSafe for further investigation.

When employees contact the Hotline, they 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 an employee makes a report, he/she will receive

an identification number so he/she can follow up on his/her concern. Following up is especially important if the employee submitted a report anonymously, as CSafe may need additional information in order to conduct an effective investigation. This identification number will also enable the employee to track the resolution of the case; however, please note that out of respect for privacy, CSafe will not be able to inform the employee about individual disciplinary actions.

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

An issue cannot be addressed unless it is brought to someone's attention.

Non-retaliation

CSafe will not tolerate any retaliation against any employee who, in good faith, asks questions, makes a report of actions that may be inconsistent with the Code, CSafe 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.



Our Employees

Health and Safety

Ensuring safety is an integral part of everything we do. Each employee is responsible for acting in a way that protects himself or herself and others. No matter the job or location, 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 CSafe and for every employee on the job, every day. Each employee should do their part to keep everyone in the CSafe family injury-free.

Alcohol and Drugs

While at work or on CSafe business, employees should:

- Always be ready to carry out their work duties and never be impaired.
- Not use, possess or be under the influence of illegal drugs or any substance, whether or not such substance is legal (e.g., prescription medicine), that could interfere with a safe and effective work environment or harm CSafe's reputation.
- Be prepared for random drug testing with respect to our active container business.

Do the Right Thing

Each employee should:



- Follow the safety, security and health rules and practices that apply to their job and work area.
- Maintain a neat, safe working environment by keeping workstations, aisles and other workspaces free from obstacles, wires and other potential hazards.
- Notify their manager immediately about any unsafe equipment, or any situation that could pose a threat to health or safety or damage the environment. Each employee has the right and the responsibility to stop any work if they feel their safety is at risk.
- Cooperate with any investigations into incidents.
- Notify their manager with any concerns – safety and security are the responsibility of all employees.

Watch Out For

Each employee should watch out for:



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



Our Employees

Harassment-free Workplace

We all have the right to work in an environment that is free from intimidation, harassment, bullying and abusive conduct. Verbal, written or physical conduct by any employee that harasses another, significantly disrupts another's work performance or creates an intimidating, offensive, abusive, humiliating 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

Each employee should:



- Read, understand and follow all policies designed to build a safe, ethical and professional workplace.
- Help other employees by speaking out when a coworker's conduct makes others uncomfortable.
- Demonstrate professionalism by not visiting inappropriate internet sites or displaying sexually explicit or offensive pictures.
- Report all incidents of potential harassment and intimidation.

Watch Out For

Each employee should 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.



Our Employees

Responsible Communications

CSafe 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 employee must help the organization ensure that only authorized persons speak on behalf of CSafe. Employees should refer any communications with the media, investors and other members of the financial community to [Marketing](#).

Watch Out For

Each employee should watch out for:



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

Social Media

Employees should be careful when writing communications that might be published online. If an employee participates in internet discussion groups, chat rooms, bulletin boards, blogs, social media sites or other electronic communications, even under an alias, he/she should never give the impression that they are speaking on behalf of CSafe.

If an employee believes a false statement about CSafe has been posted, he/she should not post or share nonpublic information, even if their intent is to “set the record straight.” The posting might be misinterpreted, start false rumors or may be inaccurate or misleading. Instead, the employee should contact [Marketing](#).



Our Employees

Diversity, Equity and Inclusion

CSafe helps bring together employees with a wide variety of backgrounds, skills and cultures. Combining such a wealth of talent and resources creates the diverse and dynamic teams that consistently drive results.

Our colleagues, job applicants and business partners are entitled to respect. We are committed to ensuring that they feel welcomed and valued and that they are given opportunities to grow, contribute and develop with us. To uphold that commitment, we support laws prohibiting discrimination and provide equal opportunity for employment, income and advancement in all our departments, programs and worksites.

This means we base employment decisions solely on qualifications, demonstrated skills and achievements – and never on race, color, religion, sex (including pregnancy, sexual orientation or gender identity), national origin, age, disability, genetic information or any other characteristic protected by law.

Do the Right Thing

Each employee should:



- Treat others respectfully and professionally.
- Promote diversity in hiring and other employment decisions.
- Not discriminate against others on the basis of any characteristic protected by law or CSafe policy.

Watch Out For

Each employee should watch out for:



- Comments, jokes or materials, including emails, which others might consider offensive.
- Inappropriate bias when judging others. If an employee supervises others, he/she should judge them on performance by using objective, quantifiable standards and avoiding unrelated considerations.



Our Organization

Confidential Information

CSafe relies on each employee to be vigilant and protect confidential information and intellectual property – 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 every employee's obligation to restrict his/her use of CSafe confidential information and intellectual property continues even after employment ends.



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

CSafe commits substantial resources to technology development and innovation, and the creation and protection of intellectual property rights are critical to our business. Employees should contact Legal if they have or receive questions regarding:

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



Our Organization

Do the Right Thing

Each employee should:



- Promptly disclose to their manager any inventions or other IP that he/she creates while employed by CSafe.
- 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 CSafe's intellectual property and confidential information by sharing it only with authorized parties.
- Only store or communicate confidential information using CSafe information systems.

Watch Out For

Each employee should watch out for:



- Discussions of CSafe 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.

Data Privacy

We respect the personal information of others. Employees should follow CSafe policies and all applicable laws and regulations in collecting, accessing, using, storing, sharing and disposing of personal information. They should only use personal information – and share it with others outside of CSafe – for legitimate business purposes, and even then to the minimal extent necessary to accomplish the desired purpose. If in doubt, contact [Human Resources](#) or [Legal](#) for guidance.

Each employee should 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

Each employee should watch out for:



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



Our Organization

Financial Integrity and Records Management

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

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

Records Management

Employees should only dispose of documents in compliance with CSafe policies and never destroy or hide them. Employees must never conceal wrongdoing, or permit others to do so, or destroy documents in response to – or in anticipation of – an investigation or audit.

Employees with questions or concerns about retaining or destroying corporate records should contact [Legal](#).

Do the Right Thing

Each employee should:



- Create business records that accurately reflect the truth of the underlying event or transaction – guided by the principles of transparency and truthfulness.
- Write carefully in all of his/her business communications – as though someday the records he/she creates may become public documents.

Watch Out For

Each employee should 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.



Our Organization

Conflicts of Interest

A conflict of interest can occur whenever an employee has a competing interest or activity that may interfere with his/her ability to make an objective decision on behalf of CSafe. Each employee 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, each employee needs to fully disclose them to his/her manager so that they can be properly evaluated, monitored and managed.

Potential Conflicts of Interest

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

Corporate opportunities

If an employee learns about a business opportunity because of his/her job, it belongs to CSafe first. This means that the employee should not take that opportunity for himself/herself unless he/she gets approval from his/her manager and [Legal](#).

Friends and relatives

On occasion, it is possible that an employee may find himself/herself in a situation where he/she is working with a close friend or relative who works for a customer, business partner, competitor or even CSafe. Since it is impossible to anticipate every scenario that could create a potential conflict, employees should disclose their situations to their 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, employees always need to disclose and discuss outside employment with their manager. If approved, the employee must ensure that the outside activity does not interfere with his/her work at CSafe. 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 CSafe.

Personal investments

A conflict can occur if an employee has a significant ownership or other financial interest in a competitor, business partner or customer. Employees always need to disclose such investments to their manager and Legal, ideally prior to making them. Depending on the size, length and status of the investment, a divestiture may be required.



Our Organization

Civic activities

Unless senior leadership specifically asks an employee to do so, employees should not accept a seat on the board of directors or advisory board of any of our competitors, business partners or customers, especially if the employee's current job gives him/her the ability to influence our relationship with them.

Do the Right Thing Each employee should:



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



Our Organization

Fair Dealing

We treat our customers and business partners fairly. We work to understand and meet their needs and seek competitive advantages through superior performance, never through unethical or illegal practices. We tell the truth about our services and capabilities and never make claims that aren't true. In short, we treat our customers and business partners as we would like to be treated.

Do the Right Thing

Each employee should:



- Be responsive to customer requests and questions, only promise what he/she can deliver and deliver on what he/she promises.
- Never take unfair advantage of anyone by manipulating, concealing or misrepresenting material facts, abusing privileged information or any other unfair dealing practice.
- Never grant a customer's request to do something that the employee regards as unethical or unlawful.
- Speak with their manager if they have concerns about any error, omission, undue delay or defect in quality or customer service.

Watch Out For

Each employee should watch out for:



- Pressure from colleagues or managers to cut corners on quality or delivery standards.
- Temptations to tell customers what he/she thinks they want to hear rather than the truth; if a situation is unclear, employees should begin by presenting a fair and accurate picture as a basis for decision-making.



Our Organization

Cooperation With Investigations and Audits

From time to time, employees may be asked to participate in internal and external investigations and audits that are conducted by CSafe. All employees are expected to fully cooperate with all such requests and ensure that any information provided is true, accurate and complete.

Employees may also receive inquiries or requests from government officials. If an employee learns of a potential government investigation or inquiry, the employee should immediately notify his/her manager and [Legal](#) before taking or promising any action. If an employee is directed by CSafe to respond to a government official's request, such employee should extend the same level of cooperation and again, ensure that the information provided is true, accurate and complete.

Watch Out For

Each employee should watch out for:



- Falsified information. Employees should never destroy, alter or conceal any document in anticipation of or in response to a request for these documents.
- Unlawful influence. Employees should never provide or attempt to influence others to provide incomplete, false or misleading statements to a CSafe or government investigator or auditor.



Our Operations

Anti-bribery and Corruption

We believe that all forms of bribery and other corrupt practices are an inappropriate way to conduct business regardless of local customs. CSafe 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 CSafe.

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

Do the Right Thing

Each employee should:



- Understand the standards set forth under anti-bribery laws which apply to their role at CSafe.
- Never give anything of value inconsistent with local laws and regulations to any government official. If an employee is 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

Each employee should 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 CSafe clearly documented in writing.



Our Operations

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 CSafe 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. Employees should report any suspicious financial transactions and activities to [Legal](#) and, if required, to appropriate government agencies.

Watch Out For

Each employee should watch out for:



- 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.



Our Operations

Gifts and Hospitality

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.

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

Government Officials

Be aware that the rules for what CSafe may give to – or accept from – government officials are much more strict. Employees should not offer anything of value to a government official without obtaining approval, in advance, from [Legal](#). Regardless, CSafe does not accept or provide gifts, favors or entertainment to anyone – even if it complies with CSafe’s policies – if the intent is to improperly influence a decision.

Do the Right Thing

Each employee should:



- 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 CSafe is involved in contract negotiations.
- Make sure that anything given or received complies with the policies of both the giver and the recipient.
- Never give or accept cash or cash equivalents.
- Never request or solicit personal gifts, favors, entertainment or services.
- Raise a concern whenever the employee suspects that a colleague or business partner may be improperly attempting to influence a decision of a customer or government official.

Watch Out For

Each employee should watch out for:



- Situations that could embarrass the employee or CSafe (e.g., 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.



Our Operations

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 employees should seek help with any questions about what is appropriate and what isn't.

Red Flags

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

- Sharing CSafe'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.

Do the Right Thing

Each employee should:



- 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.
- Not engage in conversations with competitors about competitively sensitive information.

Watch Out For

Each employee should 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.



Our Operations

Acquiring Business Intelligence

Information about competitors is a valuable asset in today's competitive business environment, but in collecting business intelligence, employees and others working on behalf of CSafe, must always act ethically. Employees and others should 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.

Do the Right Thing

Each employee should:



- Be careful when accepting information from third parties. Each employee should know and trust his/her 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.

Watch Out For

Each employee should watch out for:



- Retaining papers or computer records from prior employers in violation of law or contract.
- 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.



Our Operations

Global Trade

CSafe 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.

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. Employees should promptly report to [Legal](#) any request to join in, support or furnish information concerning a non-U.S.-sanctioned boycott.

Do the Right Thing

Each employee should:



- 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 regarding imports or exports of products, parts or technology to [Legal](#).

Watch Out For

Each employee should watch out for:



- Transferring technical data and technology to someone in another country (particularly countries that are not U.S. allies), such as through email, conversations, meetings or database access. This restriction applies to sharing information with coworkers, as well as non-employees.
- Transporting CSafe assets that contain certain technology (such as a computer an associate takes on a business trip) to another country, particularly countries that are not U.S. allies.



Our Operations

Supplier Relations

CSafe 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.

All agreements are negotiated in good faith and must be fair and reasonable for both parties. Employees should hold CSafe business partners to high standards and ensure they operate ethically, in compliance with the law and in a way that's consistent with this Code, our policies and our [Values](#). Employees should share the CSafe Supplier Code of Conduct with each supplier and/or business partner and obtain their commitment to abide by its terms.

Government Contracting

We are committed to meeting the many special legal, regulatory and contractual requirements that apply to our government contracts. These requirements may apply to bidding, accounting, invoices, subcontracting, employment practices, contract performance, gifts and entertainment, purchasing and other matters. These requirements may also flow down to individuals and companies working on our behalf.

Employees responsible for conducting business with the government on behalf of CSafe should know and comply with what's contractually required as well as all laws and regulations that apply to our government- related work.



Our World

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.

CSafe does not use or support suppliers who use involuntary labor of any kind, including prison, debt bondage or forced labor. We only employ workers who meet the applicable minimum legal age requirement in the country where they are working, and only support suppliers doing the same. CSafe complies, and expects its suppliers to comply, with all applicable child labor laws and industry best practices. Working hours, wages and overtime pay must comply with all applicable laws. Workers must be paid at least the minimum legal wage or a wage that meets local industry standards. Each employee can help support efforts to eliminate abuses such as child labor, slavery, human trafficking and forced labor.

Do the Right Thing Each employee should:



- Report to their manager, [Human Resources](#) or [Legal](#) any suspicion or evidence of human rights abuses in our operations or in the operations of our suppliers.
- Respect for human dignity begins with daily

interactions with other employees, business partners and customers. This includes promoting diversity and doing our part to protect the rights and dignity of everyone with whom we do business.

Charitable Activities

Corporate social responsibility is an integral part of CSafe'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 an organization, we contribute funds, time and talent to support organization-wide programs and local causes. We encourage (but do not require) employees to participate in the many initiatives we support.

CSafe also encourages employees to make a difference on a personal level, supporting charitable and civic causes that are important to them. Such activities must be lawful and consistent with our policies and employees should be participating on their own time and at their own expense. Employees should never pressure their colleagues to participate and unless approved in writing in advance, employees should never use CSafe funds, assets or the CSafe name to further any personal volunteer activities.



Our World

Political Contributions

Each employee has the right to voluntarily participate in the political process, including making personal political contributions. However, employees must always make it clear that their personal views and actions are not those of CSafe, and they should never use CSafe funds, time or the CSafe name for any political purpose without proper authorization.

Do the Right Thing

Each employee should:



- Ensure that his/her personal political views and activities are not viewed as those of CSafe.
- Never use CSafe resources or facilities to support their personal political activities.
- Follow all federal, state, local and foreign election laws, rules and regulations as they relate to organization contributions or expenditures.

Watch Out For

Each employee should watch out for:



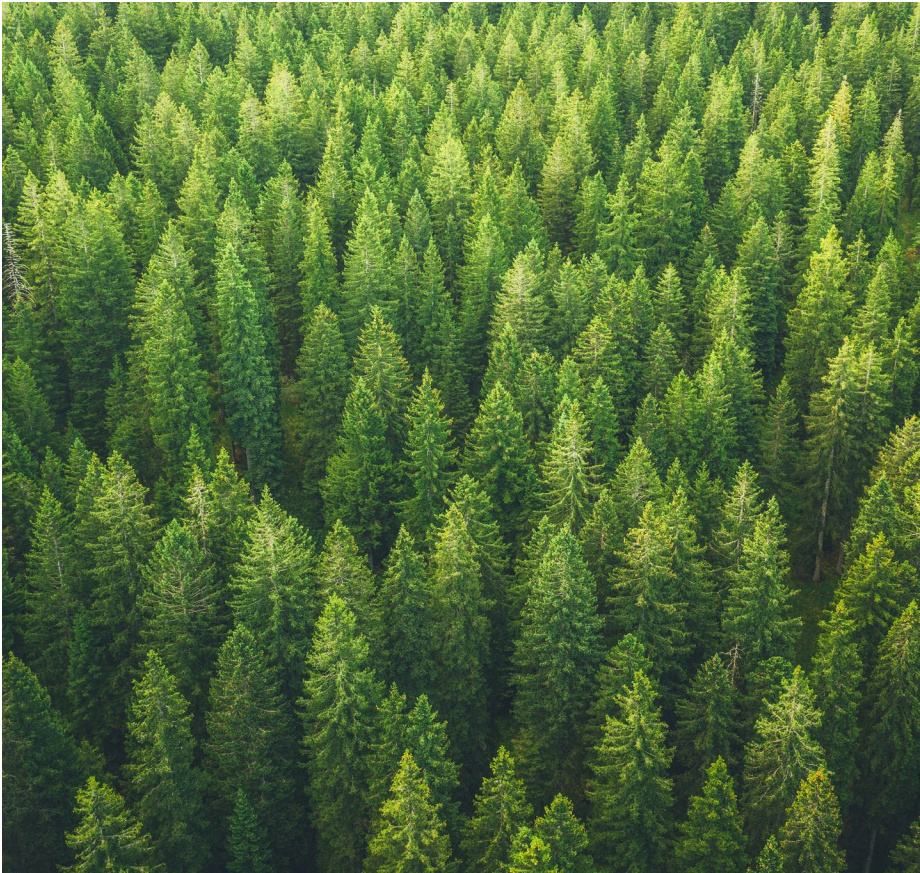
- Lobbying. Employee interactions with government officials or regulators that could be seen as lobbying must be discussed in advance and coordinated with [Legal](#).
- Pressure. Employees should never apply direct or indirect pressure on another employee to contribute to, support or oppose any political candidate or party.
- Improper influence. Employees should 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 an employee's duties at CSafe.



Our World

Environmental Stewardship

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

Each employee should:



- Promote employee safety, safeguard the environment, read and understand all the information provided by CSafe that is relevant to his/her job and operate in full compliance with environmental, health and safety laws and regulations.
- Fully cooperate with environmental, health and safety training and with CSafe's periodic compliance reviews of its products and operations.
- Stop work and report any situation that he/she believes 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 that CSafe can minimize waste, energy and use of natural resources.

Employees should contact [Human Resources](#) or [Legal](#) with questions about compliance with environmental, health and safety laws and policies.



Resources and Contacts

Human Resources

hr@csafeglobal.com

Marketing

marketing@csafeglobal.com

Legal

legal@csafeglobal.com

