



INDICOR
Code of Conduct

A MESSAGE FROM OUR CEO

Our Code of Conduct outlines the high ethical standards and commitment to integrity required from everyone at our company. Understanding this Code of Conduct and incorporating its components into your decision making will help maintain the vital trust we have established with our customers, suppliers, shareholders, and fellow employees.

Thank you for carefully reading and adhering to our Code of Conduct. Your commitment to our culture of trust and mutual respect as you engage with colleagues, customers and all the stakeholders is vital to our success!

Sincerely,

A handwritten signature in black ink, appearing to read 'DW', with a long horizontal flourish extending to the right.

Doug Wright
Chief Executive Officer

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OUR CODE OF ETHICS AND COMPLIANCE POLICIES

Code of Ethics Overview

INDICOR, LLC and each of its business units (collectively, "INDICOR") are dedicated to developing, manufacturing, and selling solutions and products that are high quality and safe and of high quality. We are committed to conducting our operations worldwide in accordance with exemplary standards of business integrity.

To achieve this, all employees of INDICOR are expected to conduct INDICOR's business in accordance with high standards of honesty and integrity. So, what does this mean for you?

- Read this Code of Conduct ("Code") fully
- Provide full and honest disclosure in any reports filed by INDICOR
- Follow the spirit and letter of the law in everything you do on behalf of the company
- Promptly report any violations of this Code
- Cooperate fully during all internal and external investigations

This Code is a guideline to assist all of our Employees in acting and making decisions on behalf of INDICOR consistent with these standards. Of course, no guidelines can be all-inclusive. Responsibility for acting consistent with the spirit of this Code rests with you.

Reporting of Violations or Concerns

There is no substitute for personal integrity and good judgment.

If you're faced with a difficult decision, consider whether you'd feel comfortable if your decision became public knowledge. If you think your decision could appear improper from a legal or ethical standpoint; if you are in doubt about the best course of action to take; or if you have questions about the applicability of this Code, please contact the Law Department.

Each of us has a duty to report all inappropriate, unethical or illegal conduct and/or behavior that may violate this Code, the law, or other Indicor policies. If you become aware of or suspect a violation, you should report to your supervisor, Human Resources, the Law Department, or log your concern directly into the company's employee hotline <https://INDICOR.ethicspoint.com>.

If you're uncomfortable reporting to your supervisor for any reason, you can anonymously contact the Indicor Ethics and Compliance Line at any time.

Any concerns regarding accounting, internal accounting controls and auditing matters may also be reported to your supervisor, HR, the Law Department, or Indicor's compliance hotline. These concerns will then be reported to INDICOR's Board of Directors to be handled pursuant to procedures the Board has established.

No Retaliation

Everyone should feel comfortable reporting possible violations. Therefore, INDICOR will neither retaliate against, nor tolerate any harassment or retaliation against, anyone for reporting in good faith suspected violations of laws, regulations or INDICOR policies or procedures, including this Code, or for otherwise engaging in any activity protected by law.

This means INDICOR will not terminate, demote, transfer to a less desirable assignment or otherwise discriminate against you for calling attention to acts that are suspected to be illegal, unethical or in violation of this Code, providing information relating to an investigation thereof or for otherwise engaging in any activity protected by law.

However, INDICOR reserves the right to discipline up to and including termination anyone who: (1) knowingly makes a false accusation; (2) knowingly provides false information to INDICOR; (3) violates this Code, any applicable law or other INDICOR policies or procedures or (4) has otherwise acted improperly.

Retaliation means any negative employment action taken against someone because he or she has made a report in good faith or is going to make a report in the future or for otherwise engaging in any activity protected by law.

Making a report in good faith does not mean you have to be certain that something unethical is happening – it just means that you have a genuine reason to believe something could be wrong.

Ways to report violations:

- To your supervisor
- To Indicor's Law Department <https://INDICOR.ethicspoint.com> to report by phone or email.

Remember!

- You can report in person, by email or by phone.
- Your questions or concerns can remain confidential or anonymous, where allowed by law.
- You don't have to include any identifying information when making a report to the INDICOR Ethics and Compliance Line.

Disciplinary Actions

INDICOR will take appropriate disciplinary action against any Employee whose actions are found to violate this Code or Company policies or procedures. ***Disciplinary actions can include immediate termination of employment where appropriate and allowed by law. This applies to all Employees, regardless of title.***

What actions can result in discipline?

- Any violation of this Code or any other INDICOR policy
- Requesting others to violate this Code or any other INDICOR policy
- Failure to promptly report, or taking actions to obscure or cover-up, known or suspected violations
- Knowingly providing false information concerning a violation or potential violation
- Retaliation against another Employee for reporting suspected violations or for taking other protected actions
- Violating any applicable law or otherwise subjecting you or INDICOR to criminal penalties (fines or jail sentences) or civil sanctions (damage awards or fines)

It's important to keep in mind violations of legal and regulatory requirements can carry their own civil and criminal penalties, including fines and imprisonment. Where INDICOR has suffered a loss, it may pursue its remedies against those responsible. INDICOR will always cooperate fully with appropriate authorities when laws have been violated.

Confidentiality

Any report of concerns contemplated by this Code will be kept confidential to the extent practicable or allowed by law.

However, you should be aware that there are certain situations that may require disclosure of confidential information in order to reach a resolution. Please see the section on "Confidential Information" for more details.



Your Responsibility and Commitment in Administration of the Code

All INDICOR Employees are required to adhere to the letter and spirit of this Code. This means complying with applicable legal requirements wherever you are around the world. Moreover, we encourage Employees to engage in ethical behavior at all times and to discuss questions or concerns with the appropriate Company personnel whenever they are in doubt regarding the best course of action.

Employees will receive and acknowledge receipt of this Code at the time they join INDICOR and **annually** will acknowledge their continuing commitment to the Code.

Updates to the Code will be distributed to Employees, as needed, to reflect changes.

CONFIDENTIAL INFORMATION

INDICOR must balance its interests in maintaining the confidentiality of information about its business with its responsibilities to make timely, complete and accurate public disclosure of such information, as well as with the rights and obligations created by applicable law. This means INDICOR requires Employees who deal with or become aware of confidential information to comply with the following guidelines and procedures.

Information to be Protected

What is Confidential Information? All company information (or information others have entrusted to INDICOR) that is:

- not generally known by the public;
- might be of use to competitors if disclosed or
- is harmful to INDICOR (or its customers or business partners) if disclosed.

Our Duty to Protect Information Entrusted to Us

We have a duty to maintain the confidentiality of all confidential information entrusted to us by INDICOR, “Designated Companies”, or their customers, unless disclosure is authorized or legally mandated, and subject to all applicable laws.

“Designated Companies” means any company INDICOR has dealings with, such as:

- current contractual arrangements (i.e. customers; suppliers of goods and services; licensees and licensors)
- possible contractual arrangements (including negotiating joint ventures, joint bids, etc. or acquiring/selling securities or assets)

“Material” Information

We need to be particularly careful to maintain the confidentiality of any “material”, non-public information.

“Material” information can come in the form of business plans or other documents, conversations or even through knowledge of an imminent press release. Labels or stamps are often used to indicate that documents and written materials contain confidential information; however, don’t rely solely on the absence or presence of a label or stamp. You still need to review the material and make your own determination.

Restricted Access

Access to material non-public information is restricted to INDICOR personnel only on a “need to know” basis. This means that every reasonable effort needs to be taken to limit both the number of INDICOR personnel becoming aware of the information and the duplication and circulation of written materials containing the information.

Generally, you should exercise your best judgment on what steps to take to restrict access to and otherwise protect the confidentiality of non-public information. In case of any doubt, immediately consult with your supervisor or INDICOR's General Counsel.

Disclosure of Non-Public Information

Generally, public disclosure of non-public information is the responsibility of management, so it's important to maintain confidentiality of non-public information regardless of whether public disclosure has occurred or you believe it has occurred, except where the disclosure is expressly authorized, permitted or required by law.

If you are contacted by anyone outside of INDICOR to discuss confidential information, **do not disclose any confidential information** and please refer them to the appropriate INDICOR management associate. Other than on the "need to know" basis, no disclosure will be made without the prior approval of INDICOR's General Counsel or other appropriate management.

How to Handle Material, Non-Public Information

If you obtain information as a result of service to INDICOR, you must:

- not disclose material, non-public or other confidential information to anyone, inside or outside of INDICOR (including family members), except on a strict need-to-know basis and under circumstances that make it reasonable to believe that the information will not be misused or improperly disclosed by the recipient; and
- refrain from recommending or suggesting that any person engage in transactions in securities of any companies that could be impacted by the material, nonpublic information.

RELATIONS WITH CUSTOMERS, SUPPLIERS AND COMPETITORS

Our success depends on building good relationships with our customers and suppliers. Cultivating an atmosphere of trust and selling our solutions and products on the basis of merit are fundamental to this goal.

Fair Dealing

We should all strive to deal fairly with INDICOR's customers, suppliers and competitors. To that end, we must not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair-dealing practice.

Unfair Competition - Antitrust

Everyone must fully comply with the antitrust laws of the United States and the competition laws in every country in which INDICOR or its affiliates do business. Generally, where U.S. laws concerning competition differ from local law and there is uncertainty as to which law applies, the more restrictive standard will be applied.

Antitrust laws forbid understandings or agreements between competitors regarding prices, terms of sale, profits, division or allocation of customers, markets or territories, credit arrangements, methods of distribution or any other activity that restrains competition.

Information concerning competitor strategies and market conditions obtained from our customers or other sources is both legitimate and desirable.

However, you should not request customers to serve as an intermediary to communicate with our competitors.

You should not obtain, accept, disclose, use or suggest that you or INDICOR possess another company's trade secrets under improper or questionable circumstances. Trade secrets include any information, documents or material whose contents are not generally known or ascertainable, have not generally been disclosed by the owner and are likely to be safeguarded by the owner.

Additionally, you should not endeavor, directly or indirectly, to restrict any customer's freedom to set his or her own prices for the resale of any INDICOR product.

Further, any unnecessary contact with INDICOR's competitors should be avoided. As a general rule, contacts and communications with competitors should be limited to those which are

Standard of Conduct

- Avoid any conduct that violates, or might even appear to violate, both the letter and spirit of an antitrust law.
- Don't enter into any agreement or understanding with any competitor regarding price.
- Don't engage in or discuss with competitors or other business partners any prohibited activities that might be interpreted as an effort to improperly restrict or limit competition (such as pricing or sale terms).

inadvertent and unavoidable (like trade shows and certain outside seminars) and you should seek appropriate clearance before engaging in further contacts or communications.

Marketing: Disparagement of Competitors

INDICOR advertising and marketing must comply with all applicable governmental laws, rules and regulations that prohibit unfair and deceptive trade practices. This includes any advertising and sales promotion policies.

It is INDICOR's policy to emphasize the quality of its products or services; however, you must not make unfounded disparaging comments about competitors or their products or services. Statements (oral or written) made concerning a competitor or its products or services must be fair, factual and complete.

When communicating about a competitor or its products or services:

- Avoid comments about a competitor's character or business practices (*e.g.*, telling a customer that a competitor's sales representative is immoral or untrustworthy).
- The primary emphasis should be on INDICOR's capabilities, know-how and the benefits of its products and services to its customer, rather than on a competitor's deficiencies.
- Avoid references to a competitor's non-product or non-service related troubles or weak points (*e.g.*, financial difficulties, pending lawsuits, government investigations).
- Statements about the specifications, quality, utility or value of a competitor's products or services should not be made unless they are substantiated by the competitor's current published information or other factual data with respect to the competitor's current products.
- Unsubstantiated claims that INDICOR originated a product or service or one of its features should not be made.

Are you responsible for any advertisement or marketing?

If so, it is important that you:

- make sure that the advertisement is truthful, not deceptive and complies with all applicable laws, rules, regulations and policies
- verify all claims regarding performance, quality, etc.

Product Safety

Manufacturing and marketing only products that can be operated and handled safely is a key business objective of INDICOR. To that end, INDICOR products will be tested to assure quality and safety standards are met. Additionally, our products will be accompanied by clear and relevant safety information and appropriate warnings and instructions regarding any reasonably foreseeable hazard that our products may pose to persons, property or the environment.

It is important to make sure that you do not authorize the shipment of product known to be defective, unsafe or unsuited for its intended use.

Offering Gifts, Entertainment and/or Travel to Customers

Attempting to improperly influence customer purchasing decisions on the basis of personal gifts, offers of entertainment, travel, discounts or special favors is improper, unacceptable and in some instances, unlawful, and is prohibited. For that reason, do not offer money, gifts or other items of value to customers or prospective customers that are or may be construed as an attempt to improperly influence their relationship to INDICOR's business interests.

There may be instances where local tradition or business practice calls for giving gifts for certain occasions. If that's the case, small gifts of nominal value can be presented, as long as the cost for that gift is fully documented. It is also important to ensure that the gift is consistent with INDICOR's more detailed compliance programs and policies. In certain limited situations, gifts of more than nominal value involving travel or entertainment could be allowed upon receipt of your supervisor's prior written approval. A gift is never permitted if prohibited by law or it is intended to be or would appear to have an improper influence. Additionally gifts of cash or cash equivalents (such as gift cards) are never acceptable.

Before accepting a gift, ask yourself:

- Is the type of gift or invitation appropriate in a business relationship?
- Is the frequency you accept offers of entertainment excessive?
- Have you secured the approval of your supervisor in advance?

Accepting Gifts from Vendors and Suppliers

Business gifts of significant value offered to you may be intended to improperly influence the selection of vendors or suppliers. Therefore, INDICOR's standards governing the acceptance of gifts from vendors or supplier companies or their agents mirror those relating to giving gifts to our customers and prospective customers.

Decisions about accepting gifts or entertainment from vendors or suppliers should be governed by local custom, discretion and good judgment. As a general rule, business gifts may be accepted provided they are of nominal value and include no cash or financial securities. In the case of meals, entertainment, lodgings or

offers of travel, the decision to accept should be guided by good judgment taking into account

the principle of reciprocity, that is, whether the individual who received such an offer is in a position to give a similarly valued gift and expense its cost under INDICOR's normal expense account procedures.

When it comes to gifts and entertainment, keep these in mind:

Don't give gifts that are excessive, improper or even give the appearance of being improper.

Don't solicit gifts, entertainment or favors of any kind from suppliers, customers or competitors.

Don't accept gifts of more than nominal value unless approved by your supervisor or Law Department.

Gifts must be properly reflected in the Company's financial books and records.

Prior disclosure of the gift to your supervisor and/or the Law Department to secure their approval can often eliminate any possible issues or potential misunderstandings.

If the gift involves a government or public official, it is crucial you comply with the information provided in the section on the Foreign Corrupt Practices Act.

If you have concerns whether a particular gift is permissible under this policy or if you want approval for any gift or entertainment not covered here, contact your supervisor or the Law Department.

RESPONSIBILITY TOWARD COMPANY PERSONNEL

The relationship between INDICOR and its personnel at every level is one based on mutual respect, reciprocal trust and shared objectives. Treating each other with respect, as further outlined below, is the foundation of good business conduct.

Health and Safety

INDICOR continually strives to provide a safe and healthy workplace in compliance with all applicable governmental laws and regulations. To support that initiative, you are expected to comply with all applicable workplace health and safety rules. If your position requires compliance with any workplace safety and health requirements, you must be provided with the appropriate training.

Threats or acts of violence will not be tolerated and must be reported immediately. Any Employee who threatens or perpetrates a violent act will be subject to disciplinary action, up to and including termination of employment, civil litigations and/or criminal prosecution.

How can I help to promote a safe workplace?

- Abide by this Code and applicable laws and policies.
- Intervene quickly if you see something or someone behaving unsafely.
- Be aware of how your decisions and actions will affect the health and safety of others.

Non-Discrimination and Harassment

In compliance with all applicable laws, INDICOR does not discriminate in its hiring, promotion or other employment practices on the basis of race, color, age, national origin, citizenship, gender, gender identity, gender expression, sexual orientation, religion, disability, pregnancy, veteran status or any other characteristic protected by law. In fact, INDICOR is strongly committed to recruiting, hiring and promoting qualified individuals from racial minority groups, as well as women, veterans and those with disabilities.

INDICOR is determined to maintain a work environment that is free of all forms of harassment, including verbal or physical abuse or intimidation of, or conduct that denigrates or shows hostility or aversion to, any person because of race, color, religion, gender, gender identity, gender expression, sexual orientation, national origin, citizenship, veteran status, age, pregnancy or disability. Accordingly, any such harassment, disparaging comments or insults will not be tolerated.

Harassment can take many forms, including unwelcome verbal or physical contact, written communication or repeated misconduct that a reasonable person would see as offensive. Bullying and harassment of any type, whether sexual in nature or not, is a violation of our policies. Harassment does not require intent.

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| <p><u>DO:</u></p> <ul style="list-style-type: none">• respect the diverse characteristics of your fellow employees• build trust in your teams through respect• speak up if you suspect or observe that someone is being harassed or bullied | <p><u>DON'T:</u></p> <ul style="list-style-type: none">• create hostile or intimidating environment through your actions or words• make inappropriate comments or jokes• be insulting or abusive to or about anyone |
|--|--|

Any Employee who believes that he or she (or another employee) was subjected to discrimination or harassment should report the matter to their supervisor, HR, the Law Department, or through the INDICOR Ethics and Compliance Line, by using <https://INDICOR.ethicspoint.com>. All allegations of any kind asserted by or against an employee, former employee, vendor, customer, or contractor involving discrimination, harassment, hostile work environment, safety or environmental concerns or retaliation must be reported to Human Resources, Legal or business leadership.

Privacy

INDICOR respects the privacy of its Employees and recognizes that most of the data collected in Company files pertains to the individual's background, family, income, contributions and health-- information which is confidential in nature. Employees with access to this type of information must comply with all applicable laws, rules and regulations that impose a standard of confidentiality for such records and the disclosure of such information. Therefore, if you have access to such records, apart from disclosure that may be required by law, you are not authorized to release data concerning the personal affairs of any Employee to anyone outside of INDICOR except on a demonstrated need-to-know basis.

Substance Abuse

INDICOR is committed to providing workplaces free of substance abuse. Accordingly, Employees should report to work in condition to perform their duties, free from the influence of illegal or unauthorized drugs, marijuana or alcohol. In addition, the use, possession or distribution of illegal or unauthorized drugs, marijuana or alcohol on Company time or Company premises is prohibited.

Labor Representation

While INDICOR prefers to deal with its personnel on an individual basis, it also recognizes that issues involving union or works council representation must be resolved within the framework of law, on a unit-by-unit basis. Therefore, where collective representation exists, INDICOR will strive to build a relationship with those representative organizations based on the principles of



good faith and mutual respect. INDICOR is committed to complying with all applicable laws, rules and regulations governing employment, immigration, and labor relations, including working hours and fair wages.

CONFLICTS OF INTEREST AND CORPORATE OPPORTUNITIES

Conflicts of Interest

We must be careful to avoid actions that conflict, or even appear to conflict, with INDICOR’s best interests. A “conflict of interest” occurs when an individual’s private or personal interest interferes in any way, or even appears to interfere, with the interests of INDICOR. These can include:

- representing INDICOR in dealings in which that individual has a vested interest;
- soliciting personal favors from those with whom INDICOR does business;
- working for or providing advice or consulting services to a competitor, supplier or customer of INDICOR, running a business that competes with INDICOR or taking a position that interferes with one’s duties to INDICOR;
- becoming an officer or director of or having a financial interest in a company with whom INDICOR does business or competes; and
- other circumstances in which the person’s loyalty to INDICOR would be divided.

These situations, and others like them, must be avoided unless approved by the Law Department.

INDICOR Employees may not have a financial interest in any Company customer, supplier, distributor, sales representative or competitor that might cause divided loyalty or even the appearance of divided loyalty.

A conflict situation can arise when an Employee:

- takes actions or has interests that may make it difficult to perform their duties objectively and effectively
- receives, either directly or indirectly, improper personal benefits as a result of their position with INDICOR (an indirect benefit could be a benefit provided to a family member)

If you are ever in doubt about the propriety of a transaction, consult your supervisor or the Law Department.

Loans from INDICOR to any Employees must be approved in advance by INDICOR’S Board of Directors or its designated committee.

Without prior approval, Employees may not perform outside work for other parties or solicit such business on Company premises or Company time, which includes time given with pay to handle personal matters. Neither are they permitted to use Company equipment, telephones, materials, resources or proprietary information for any outside work.

Each Employee must promptly disclose his or her actual or potential conflicts of interest to his or her supervisor or to the Law Department.

Corporate Opportunities

Employees owe a duty to INDICOR to advance its legitimate interests when the opportunity to do so arises. No Employee may:

- personally take for themselves, or help others take for their benefit, a business opportunity that is discovered through the use of Company property, information or position;
- use INDICOR's name, property, information or position for personal profit, gain or advantage (other than compensation from INDICOR) or
- compete with INDICOR.

Each Employee must be particularly attentive to the possibility of misappropriating a corporate opportunity of INDICOR and, in any case of uncertainty, an Employee should promptly consult with his or her supervisor or the Law Department.

PROTECTING CORPORATE ASSETS

We have a duty to safeguard INDICOR's assets against theft, loss or misuse. Assets can include:

- intangible assets (e.g. customer lists, manufacturing processes, engineering drawings and specifications, software code, intellectual property and a variety of information in written or digitally stored form)
- tangible assets (e.g. money, equipment, supplies, facilities, inventory and materials)

Constant vigilance in protecting INDICOR's trade secrets, business data and proprietary know-how against industrial espionage is expected.

Similarly, responsible management of INDICOR's resources requires an accurate accounting for uses made of INDICOR's material assets, as well as of personnel time. INDICOR resources must not be diverted for unauthorized uses.

When is use proper?

- when used for their intended business purposes
- reasonable and limited use of your INDICOR issued telephone or computer

When is use not proper?

- when used for outside business or personal political activities
- when used to download, view or send materials that are unlawful or unethical

PROPER Use of Corporate Assets

Every Employee with access to company money or property has an absolute responsibility to manage it with the utmost level of integrity and to avoid any misuse of such assets. Fraud, theft, embezzlement or other improper means of obtaining corporate funds by INDICOR personnel are unethical, illegal and completely unacceptable. Unless specifically authorized, you may not misuse or remove from INDICOR facilities any company property (e.g. furnishings, equipment, supplies, as well as property created, obtained or copied by INDICOR for its exclusive use such as files, reference materials and reports, computer software, data processing systems and data bases).

The integrity of INDICOR computer programs and data must not be compromised. Exercise great care in protecting these assets against intentional or unintentional corruption.

INDICOR's products and services are its property, and contributions an Employee makes to the development and implementation of such while employed by INDICOR are company property and remain company property even if his or her employment is terminated.

It is important that we prevent theft or misappropriation of company property by taking continual care to limit such losses by normal precautions and by handling company assets in a prudent manner.

Safeguard company property by:

- following IT and Cybersecurity policies and procedures,
- locking up equipment, supplies and materials when no one is around to secure them,
- protecting user IDs and passwords,
- being alert to phishing scams and other attempts to obtain sensitive personal or corporate information,
- recognizing that bad actors continuously attempt to deceive company employees and fraudulently obtain company property (such as company funds through false pretenses),
- reporting suspicious persons or activities to security personnel,
- refraining from downloading unauthorized applications or software and
- avoiding discussions of sensitive or confidential company information in the presence of unauthorized persons (i.e. hallways, elevators, restaurants, social media platforms).

Records Management

It is important to maintain our records in a way that complies with all applicable laws, rules and regulations, and allows for availability in case of litigation, audits or investigation.

All Employees are required to cooperate fully with any appropriately authorized internal or external investigation, including violations of this Code and pending litigation. If you are requested to preserve documents in accordance with an investigation or legal hold, you must fully comply, and should never withhold, tamper with, destroy or fail to communicate relevant information.

Intellectual Properties

INDICOR has made major investments in its intellectual properties which includes:

- patents
- tradenames
- software code
- trademarks
- brand names
- proprietary information (e.g. processes, data, know-how, trade secrets, formulas, improvements, production techniques, computer programs, and vendor and customer contract information and lists)

Employees may not disclose to unauthorized individuals--whether inside or outside of INDICOR--any information that would tend to compromise proprietary technologies or trade operating secrets. In addition, reasonable precautions should be taken to prevent the inadvertent

disclosure of such information. This confidentiality of company information applies even after the individual has left the employment of INDICOR.

In addition, just as INDICOR expects its intellectual property and proprietary information rights to be observed, INDICOR respects the property rights of others. Accordingly, it is contrary to INDICOR policy for Employees to intercept, duplicate or appropriate through electronic or other means such materials as computer software, audio or video recordings, publication or other protected intellectual properties, except by permission of the patent or copyright holders. Any offer of confidential information from outside sources should be refused unless appropriate legal safeguards are taken.

ACCURACY OF CORPORATE RECORDS AND REPORTING

All of our Employees generate records as part of their regular tasks and it is crucial that all INDICOR Employees make only true and accurate statements and representations. This applies not only to INDICOR records, but also to government agencies, suppliers, customers, the press and the general public. Every Employee involved in creating, transmitting or entering information into INDICOR's financial and operational records (including time sheets, sales records and expense accounts) is responsible and must take care to do so completely, honestly and accurately.

How to Ensure Accuracy

To ensure compliance with this policy, it's important that we strive to:

- ensure that business transactions are properly authorized and that clear, complete and accurate entries of those transactions are created and recorded on INDICOR's books and records in accordance with Generally Accepted Accounting Principles and INDICOR's internal controls policies and procedures;
- detail the true nature of every transaction or payment in its supporting documentation;
- report the existence of any undisclosed or unrecorded funds or other assets;
- ensure that all reports to regulatory agencies are full, fair, accurate, timely and understandable;
- cooperate with investigations into or audits of INDICOR's financial records;
- to the extent estimates and accruals are necessary in Company reports and records, ensure they (i) are supported by appropriate documentation and based on good faith judgments compliant with INDICOR's accounting policies and procedures and (ii), to the extent material, have been approved by management;
- ensure payments are always only made to the person or the firm that actually provided the related goods or services and
- ensure that contacts with taxing authorities are handled in accordance with INDICOR's accounting policies and procedures.

All Employees are expected to submit accurate expense accounts. To submit an expense account for meals not eaten, miles not driven, airline tickets not used or for any other expense not incurred is dishonest reporting and is prohibited.

Accounting Controls

All transactions must be properly and accurately recorded on INDICOR's books and records, in compliance with Generally Accepted Accounting Principles, INDICOR's internal control over financial reporting and other internal controls, and any other applicable Company policies and procedures. No unrecorded bank accounts, corporate funds or assets may be maintained, and all entries made in any corporate books or records must be accurate and comply with INDICOR's policies and procedures. Furthermore, it is the responsibility of all INDICOR Employees, within the scope of their employment duties, to ensure that all financial recordkeeping and records to governmental agencies be truthful and accurate.

All INDICOR personnel subject to this Code are prohibited from coercing, manipulating, misleading or fraudulently influencing any independent or certified accountant involved in auditing or reviewing INDICOR's financial statements for the purpose of rendering the financial statements misleading.

Documentation

Corporate funds may not be paid with the intent or understanding that any part of such payment is to be used for a purpose other than that described by the document supporting such payment.

Any documentation of corporate actions made should comply with the reporting policies, procedures and requirements of INDICOR and any applicable governmental agency providing oversight or having jurisdiction over such matter. Documentation should be accurate and retained as provided by statute, regulation or instruction by such agencies. Employees are strictly prohibited from destroying, altering or falsifying documents or records with the intent to impede, obstruct or improperly influence the investigation or proper administration of any matter within the jurisdiction of any governmental department or agency.

Anti-Money Laundering

INDICOR is committed to the prevention, detection and reporting of money laundering and terrorist financing. Money laundering is the process of converting illegal proceeds so that funds are made to appear legitimate. To protect our company, you must act diligently to prevent any INDICOR products or services from being used to further money laundering. If you detect suspicious activity, promptly report it to your supervisor or the Law Department.

Public Communications

In order to ensure that all disclosures of company information are accurate and in full compliance with applicable laws and regulations, all such disclosures are to be made only through specifically established channels. See the "Media Contact" section for more information.

In addition to performing their duties and responsibilities under these requirements, each of the Corporate Executive Officers will establish and manage reporting systems and procedures with due care and diligence to ensure that:

- Public communications contain information that is accurate and understandable and do not misrepresent or omit material facts;
- Business transactions are properly authorized and completely and accurately recorded on INDICOR's books and records in accordance with generally accepted accounting principles and INDICOR's established financial policies; and
- Retention or disposal of company records is in accordance with established INDICOR policies and applicable legal and regulatory requirements.

RESPONSIBILITIES TO THE PUBLIC

Relations with Public Officials; Foreign Corrupt Practices Act

INDICOR strictly abides by all applicable anti-bribery and anti-corruption laws, including the Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act. INDICOR prohibits giving anything of value, directly or indirectly, to officials of foreign governments or foreign political candidates in order to obtain or retain business.

INDICOR has developed policies, procedures and internal controls for complying with anti-bribery and anti-corruption laws. This includes conducting third-party due diligence with a view to mitigating the risk of becoming involved in corruption through third parties

In dealing with legislators, regulatory agencies, government field agents or other public officials, political party, party official or political candidate, INDICOR personnel must not:

- engage in any improper conduct intended to obtain, retain or direct business,
- improperly influence any such persons or their associates into taking improper actions or to avoid taking required action, or otherwise in the conduct of their duties.

As a general proposition, payments, gifts or other things of value are not to be given to governmental official for any reason whatsoever. This holds true both in the U.S. and abroad even though appropriate payment by INDICOR personnel to foreign governmental or quasi-governmental representation to facilitate or expedite the performance of routine governmental actions not involving diversion to award business to or continue doing business might be permitted under U.S. and foreign law.

A third party cannot be used to try to hide a bribe. Suppliers, agents, distributors and business partners cannot offer or receive a bribe related to working for INDICOR or on INDICOR's behalf. Appropriate due diligence must be carried out in relation to third parties who are assessed as presenting a risk. Payments and expenses must be closely monitored and audited to ensure compliance with this provision.

What are our responsibilities?

- Never offer, promise, or provide anything of value (no matter how nominal) to a government official in order to gain a business advantage.
- Never instruct, authorize or allow a third party to make a prohibited payment on your behalf.
- Never make a payment to a third party knowing or having reason to believe that it is likely to be used to improperly provide something of value to a government official.
- Always record any payments made or receipts obtained accurately, completely and in a timely manner.

Remember, a bribe can take the form of money, gifts, services or any other benefit.

Deviation from this policy should be considered and approved only on a case-by-case basis and only after referral to the Law Department. Requests by governmental agencies for information or meetings other than routine communications in the ordinary course of business (e.g., routine export compliance communications) should be referred to INDICOR's General Counsel. If your personal safety, security or freedom of movement is at risk, a payment may be made and then reported to the Law Department after the fact and must be properly reflected in the Company's books and records.

Political Activities and Contributions

INDICOR is committed to comply with any applicable laws regarding political contributions, including those that prohibit companies from making political contributions in connection with elections. INDICOR Employees are prohibited from conducting personal political activities using company time, property or equipment. In addition, you must not make any political contribution in INDICOR's name or on behalf of INDICOR without prior approval from INDICOR's Chief Executive Officer. This includes not only direct contributions to candidates, but also other activities such as buying tickets to a political event, providing goods or services or paying for advertisements and other campaign expenses.

Any charitable contribution made by or on behalf of the company may never be done for the purpose of influencing a customer, vendor, government agent or decision of a third party.

Media Contact; Public Statements

In order to ensure that all disclosures of INDICOR information are accurate and in full compliance with applicable laws and regulations, INDICOR requires that all such disclosures be made only through specifically established channels.

In order to make sure that news released about INDICOR is accurate, timely, consistent and in compliance with applicable legal requirements, such releases are the responsibility of INDICOR's Chief Executive Officer, Chief Financial Officer and General Counsel, to be carried out pursuant to appropriate procedures as they shall develop and implement. As a general rule, all inquiries from general, trade or finance news media should be referred to such Corporate Executive Officers.

Social Media Use

We must be cognizant of the impact and unintended consequences that can result from our use of social media. To that end, any use of social media must be in compliance with applicable law, rules, regulations and INDICOR policies. Employees must ensure all communications are

professional and do not have a negative impact on our company. In addition, we must not make personal comments that could be interpreted as a comment or endorsement by INDICOR.

Most importantly, we must never discuss or disclose confidential information or release material, non-public information. Please see the section on “Confidential Information” for more details.

Environmental Protection

INDICOR is committed to protecting the environment, ensuring sustainability and supporting social responsibility. We are dedicated to taking all appropriate measures to assure that our manufacturing, transportation and waste disposal activities are consistent with environmental protection. This includes:

- assigning qualified personnel to manage INDICOR’s environmental controls programs,
- cooperating with government and industry groups to develop appropriate standards,
- engineering production facilities to reduce or eliminate the discharge of pollutants,
- informing Employees and community residents about relevant environmental control matters,
- dealing only with reputable waste disposal contractors and
- complying with all applicable laws and regulations.

Within the scope of their employment, Employees are expected to identify and manage all environmental and social risks with applicable laws, rules and regulations pertaining to the environment.

Respecting Local Law and Customs

As in the United States, INDICOR expects to obey the law wherever we operate. Also, we endeavor to respect local customs and institutions outside the U.S. It’s common in many countries (and often even legal in those countries) to offer payments in exchange for expedited services. However, we must not use local custom as an excuse for violating applicable laws or corporate policies. We regard observing local law to be the minimum acceptable level of conduct; INDICOR’s own standards frequently oblige us to go beyond that legal minimum and to conduct our affairs according to a higher standard. Therefore, we do not permit such payments.

Anyone who feels that he or she is faced with a conflict between INDICOR policies and local custom or law should contact the Law Department .

Likewise, nothing in this Code should be misinterpreted to require any activity that is prohibited by applicable law, or to prohibit any activity that is protected by applicable law.

Anti-Boycott Laws

INDICOR must not enter into agreements that have the effect of furthering any unsanctioned boycott of a country that is friendly to the United States. The United States prohibits actions and agreements that could further any boycott not approved by the United States, including:

- refusing to do business with other persons or companies;
- discriminating in employment practices;
- furnishing information on the race, religion, gender or national origin of any U.S. person or
- utilizing letters of credit that contain prohibited boycott provisions.

INDICOR must report any request to take action or attempt to reach agreement that would violate these prohibitions.

Export and Import Controls

Many countries, including the United States, place controls and/or prohibitions on certain international transactions involving exports, re-exports, imports and the disclosure of technical data to foreign persons. International transactions include the transfer or receipt of goods, technology, information, data or software for any reason and by any means, including electronic transmission. Employees must comply with all such applicable laws, rules and regulations. Prior to engaging in an international transaction, Employees must ensure that the transaction complies with all applicable laws, rules and regulations.

Embargoes and Sanctions

Many countries, including the United States, restrict financial dealings with a large number of entities throughout the world, even with entire countries. INDICOR must comply fully with all economic sanctions and embargoes that restrict persons or corporations from doing business with certain individuals, groups, entities or countries. If you suspect any violation of a sanction or embargo, promptly report to the Law Department.

Human Rights

We are committed to respecting human rights everywhere and support global efforts to protect human rights. All of our businesses, employees, agents and vendors must comply with all applicable laws prohibiting forced labor, child labor, human trafficking and modern-day slavery.

Who to contact for help with this Code

- Talk to your supervisor
- Talk to the Law Department
- Use the INDICOR Ethics and Compliance Website for reporting by phone or via <https://INDICOR.ethicspoint.com>.

Remember, you can always ask a question or raise concerns in person, by email or by phone. You can remain confidential or anonymous, where allowed by law. When making a report to the INDICOR Ethics and Compliance Line, you do not have to include any identifying information.