AZENTIO[®]

Code of Ethics and Business Conduct



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introduction

- WHO MUST FOLLOW OUR CODE?
- WHAT IF I HAVE CODE RELATED QUERIES?
- RAISING CONCERNS
- NO RETALIATION





→ WHO MUST FOLLOW OUR CODE?



The Code applies to:

- Members of the board of any /all
 Azentio entities ("Board Members")
- All employees ("employees")
- Service Providers ("Service Providers" or "Partners"):
 - Employees of third parties temporarily assigned to perform work or services for Azentio;
 - Third party vendors, contractors, consultants;
 - Sales agents, representatives, distributors and/or resellers;
 - Any other service providers that are engaged by Azentio for rendering services.

→ RAISING CONCERNS

We encourage our employees, customers, Service

Providers and other stakeholders to raise concerns when
they become aware of any actual or potential violation of
our Code, policies or law. We also encourage reporting of
any event (actual or potential) of misconduct that is not
reflective of our values and principles. Avenues available
for raising concerns or queries or reporting cases include:

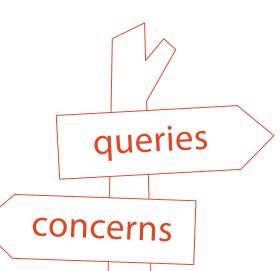
- Immediate line manager or HRBP
- Legal Department[email: LegalCompliance@Azentio.com]
- Confidential Reporting Ethics Helpline.

→ WHAT IF I HAVE CODE RELATED QUERIES?

If you have a question or concerns, please contact your manager; your HR business partner (HRBP); or the Legal Department.

→ NO RETALIATION

Azentio prohibits retaliation against any employees,
Service Providers and / or other stakeholders who,
acting in good faith, reports a concern or assists in an
investigation of a possible violation of our Code,
policies, or the law.

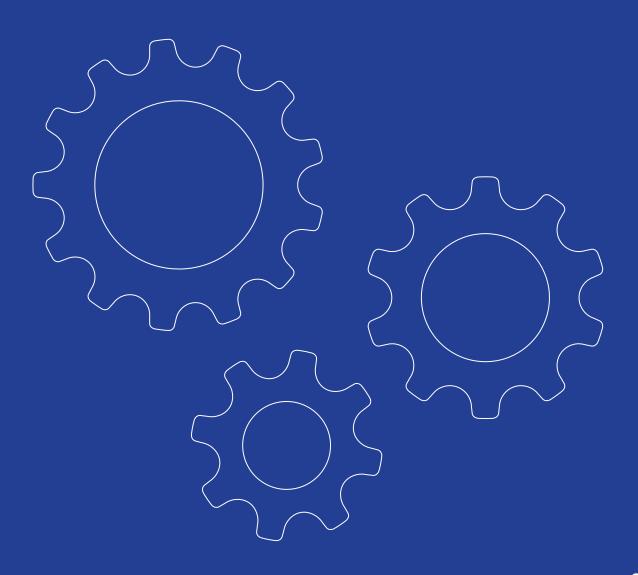




azentio principles

- EQUAL OPPORTUNITY EMPLOYER
- RESPECTFUL WORKPLACE
- BRIBERY AND CORRUPTION
- GIFTS AND ENTERTAINMENT
- CONFIDENTIAL INFORMATION
- CONFLICT OF INTEREST

- PERSONAL RELATIONSHIPS AT WORK
- OUTSIDE EMPLOYMENT
- FINANCIAL INTEGRITY AND RESPONSIBILITY
- ACCOUNTABILITY FOR MANAGERS
- CONCLUSION



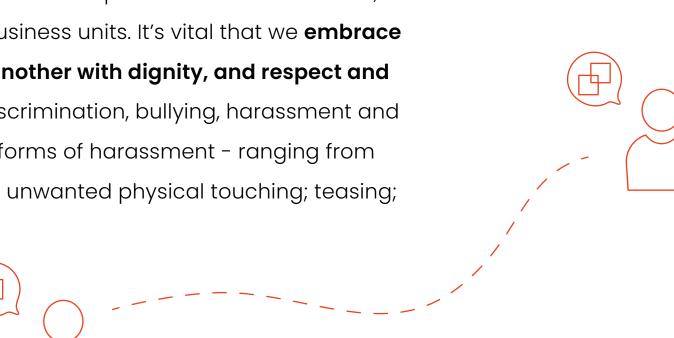
→ EQUAL OPPORTUNITY EMPLOYER

We provide equal opportunities to all our employees and to all eligible applicants for employment in our company. Azentio bases employment decisions on **merit, considering qualifications, skills and achievements.**

We **prohibit unlawful discrimination or harassment** on the basis of race, caste, religion, colour, marital status, gender, sexual orientation, age, nationality, ethnic origin, disability or any other category protected by applicable law.

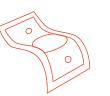


At Azentio, everyone is entitled to a **safe and respectful work environment**. Our employees collaborate with each other in-person and across offices, time zones, cultures, countries and business units. It's vital that we **embrace each other's differences, treat one another with dignity, and respect and create a shared culture**, free from discrimination, bullying, harassment and retaliation and refuse to accept any forms of harassment - ranging from sexual harassment; threats; violence; unwanted physical touching; teasing; shouting; screaming; or ridicule.









→ BRIBERY AND CORRUPTION

Our employees and those representing us, including agents and Service Providers, shall not, directly or indirectly, offer or receive anything of value, including but not limited to gift or entertainment, kickbacks, facilitation payments to any government official or any private individual/entity or their representatives to obtain or retain business, influence business decisions, or secure an unfair business advantage.

As a global company, we ensure compliance with the laws of all the jurisdictions where we conduct business, including but not limited to, the Prevention of Corruption Act, 1988 (India), the U.S. Foreign Corrupt Practices Act (FCPA) and the Bribery Act 2010 (U.K.), etc.



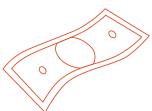
Please refer to detailed Anti-Bribery and Anti-Corruption policy here.

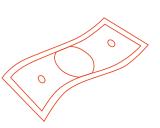


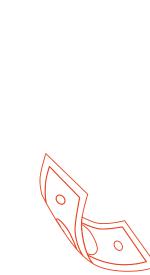




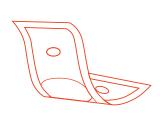


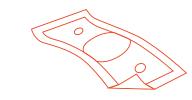










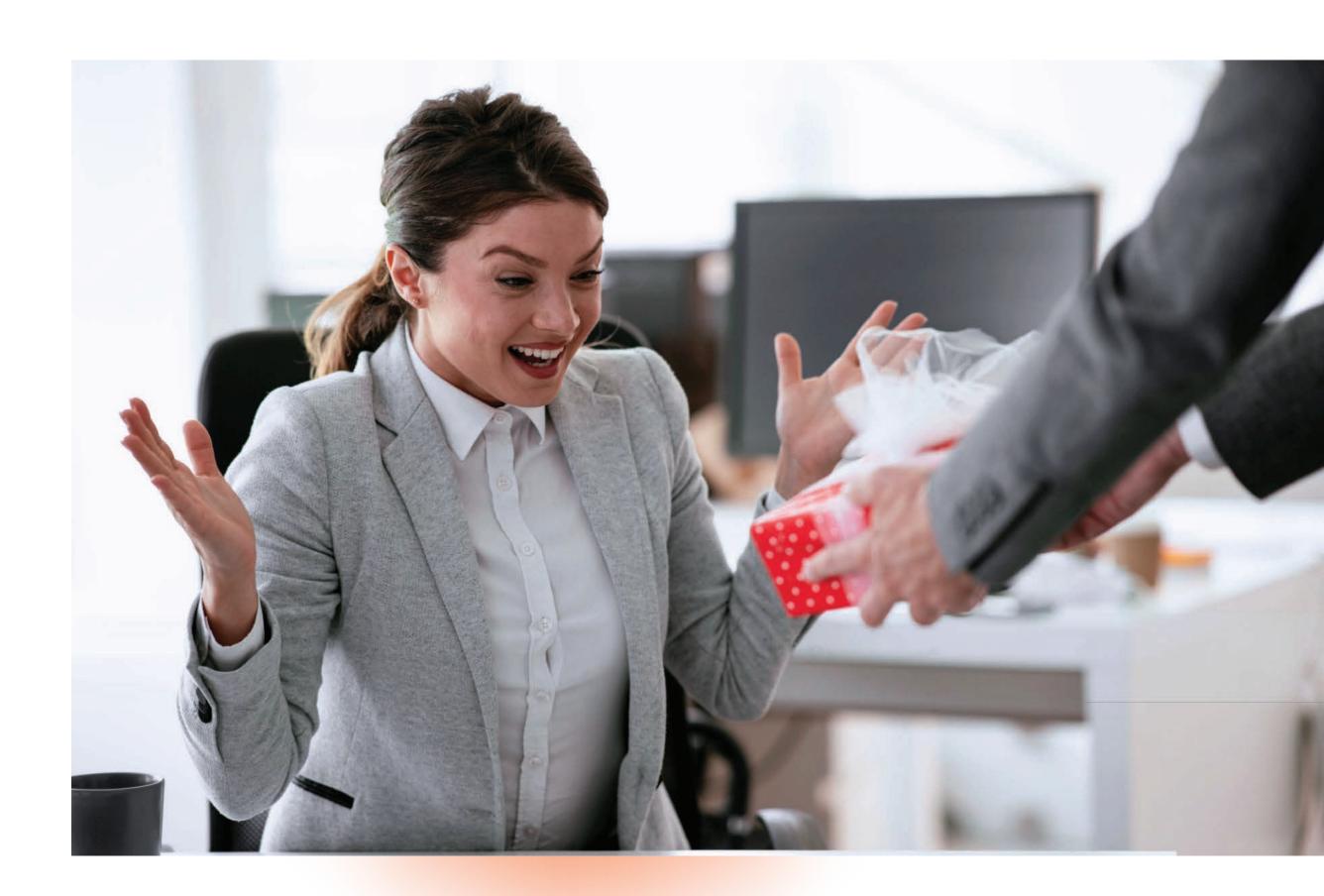


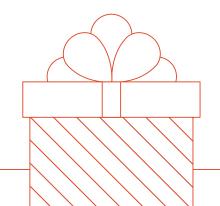
→ GIFTS AND ENTERTAINMENT

Business courtesies in the form of gifts, meals, entertainment, and other things of value can contribute to building relationships when offered or received with good intent and within established limits **not to exceed**US \$50 for commercial customers and US \$25 for government customers). If gifts or hospitality (including entertainment or travel), even within the amounts set out above are frequent, they may create the perception of, or an actual conflict of interest or an 'illicit payment'. Therefore, gifts and hospitality given or received should be modest in value, infrequent and appropriate, and in compliance with local gift giving customs and practices and not violate local laws.



A general guideline for evaluating whether a gift or other business courtesy is appropriate is whether public disclosure would be embarrassing to you, to Azentio, or to the recipient.





Employee Policy Certification

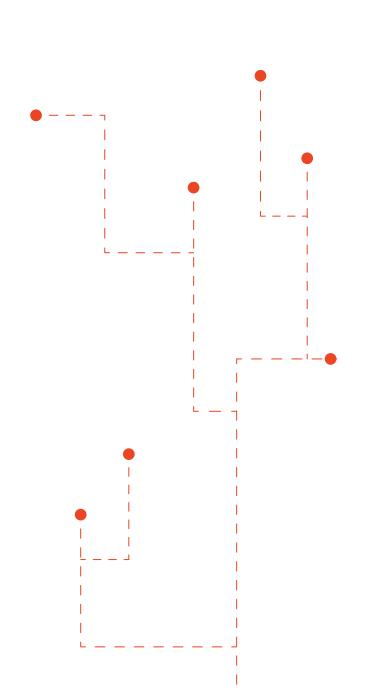
→ CONFIDENTIAL INFORMATION

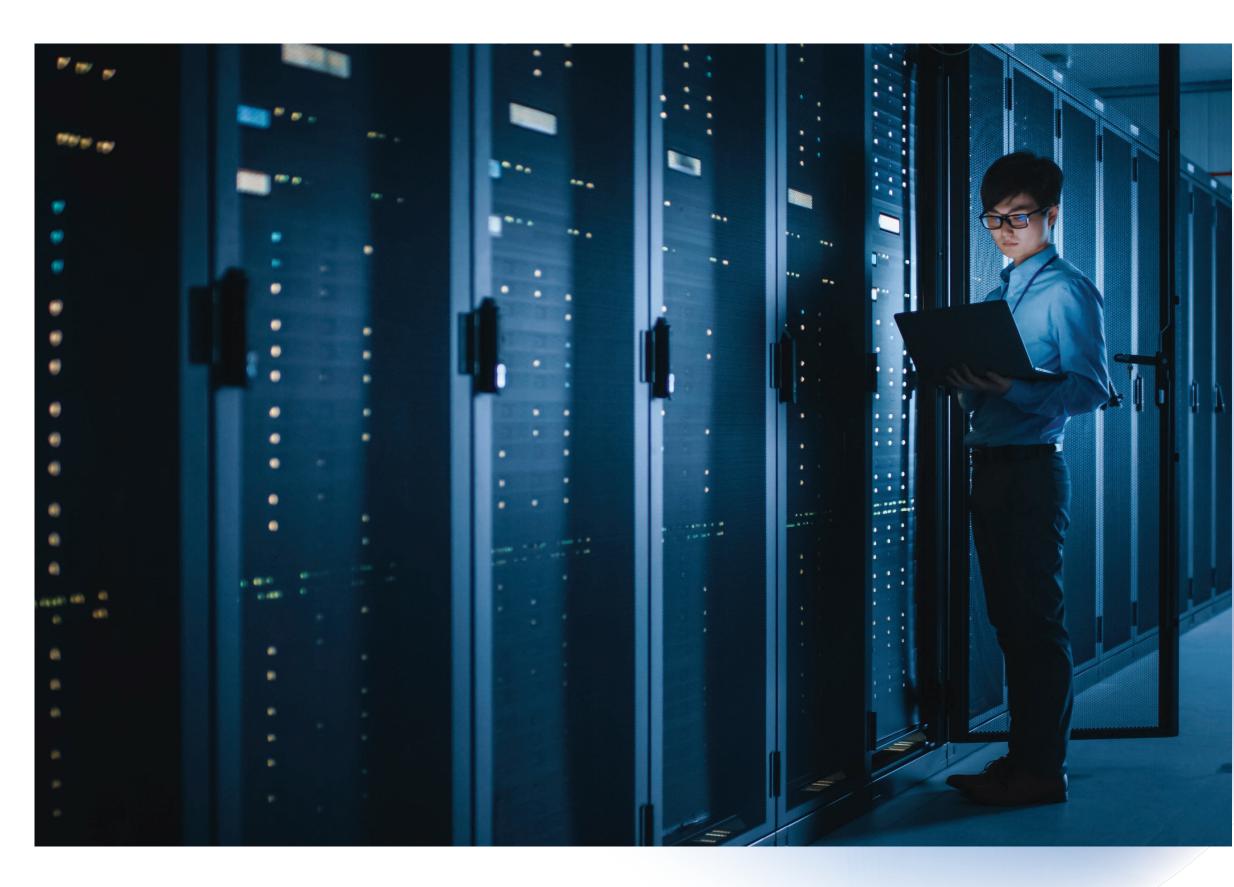
Protecting Azentio's proprietary information, intellectual property, trade secrets, company assets and personal information benefits us all.

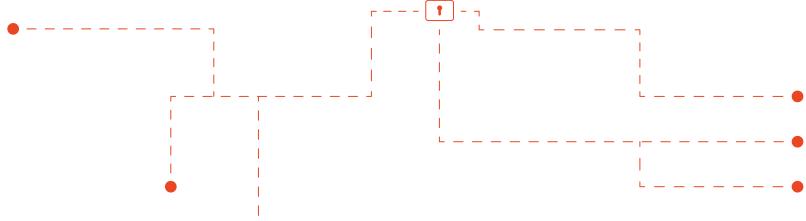
Information is one of the **most** valuable assets our business holds.

If our trade secrets or confidential information were disclosed to competitors or others, it could take away our competitive advantage `or harm our business.

Additionally, employees must safeguard the confidentiality of all third-party intellectual property and data. Azentio employees shall not misuse third-party intellectual property and data that comes into their possession and shall not share it with anyone, except in accordance with applicable company policies or law. Further, employees shall promptly report any loss, theft, or inadvertent destruction of any Azentio confidential information / intellectual property or of that belonging to any third-party.







→ CONFLICT OF INTEREST

Employees, Board Members and Service Providers shall **always act in the best interest of Azentio** and ensure that any business or personal
association (including close personal relationships) which they may have, **does not create a conflict of interest with their duties at Azentio.**

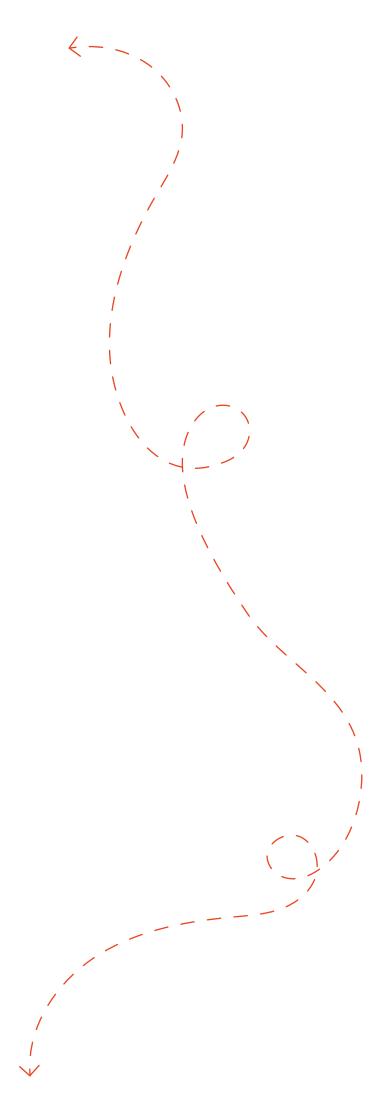
At the time of appointment in our company, our employees shall make **full** disclosure to the Chief People Officer, of any interest leading to an actual or potential conflict that such persons or their immediate family (including parents, siblings, spouse, partner, children) or persons with whom they enjoy close personal relationships, may have in a family business or a company or firm that is a competitor, supplier, customer or distributor of, or has other business dealings with, our company.

Should any actual or potential conflicts of interest arise, the concerned employee must immediately report such conflicts and seek approvals from the Chief People Officer. The Chief People Officer shall revert to the employee within a reasonable time so as to enable the concerned employee to take necessary action to resolve or avoid the conflict in an expeditious manner.



Examples of **potential conflicts of interest**:

- An activity or business that might compete with Azentio or advance a competitor's interest
- A financial interest in Azentio's vendor, reseller, competitor, customer, or distributor
- Sharing confidential information obtained at Azentio with a friend or relative who is employed by a competitor or partner and/or vendor
- Taking personal advantage of a business or investment opportunity you learned about because of your job
- Favoring a supplier or business partner for reasons other than price, quality, performance, and suitability of the product or service, or due to a personal relationship
- Workplace relationships where you hire or manage family members, spouses, partners, or romantic interests
- Associating Azentio with, or indicating Azentio branding support for, any civic, non-governmental, religious, political, or professional association without prior written approval from the General Counsel



→ PERSONAL RELATIONSHIPS AT WORK

Certain relationships within Azentio may compromise or be seen to compromise your ability to perform your job responsibilities, may create uncomfortable or conflicted positions, and may raise issues of fairness, favoritism, or harassment.

Therefore, **be mindful** of how your relationships within Azentio could impact or be perceived by others.

Romantic, physical or familial relationships are not permitted between employees or member of the extended workforce where one individual is in a position to exercise authority or supervision over the other. This prohibition includes any situation where one person is in the reporting line of the other.





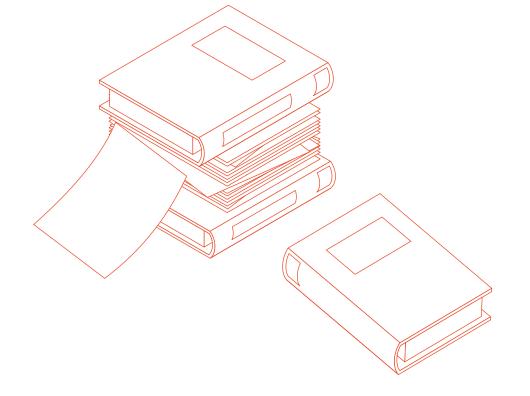


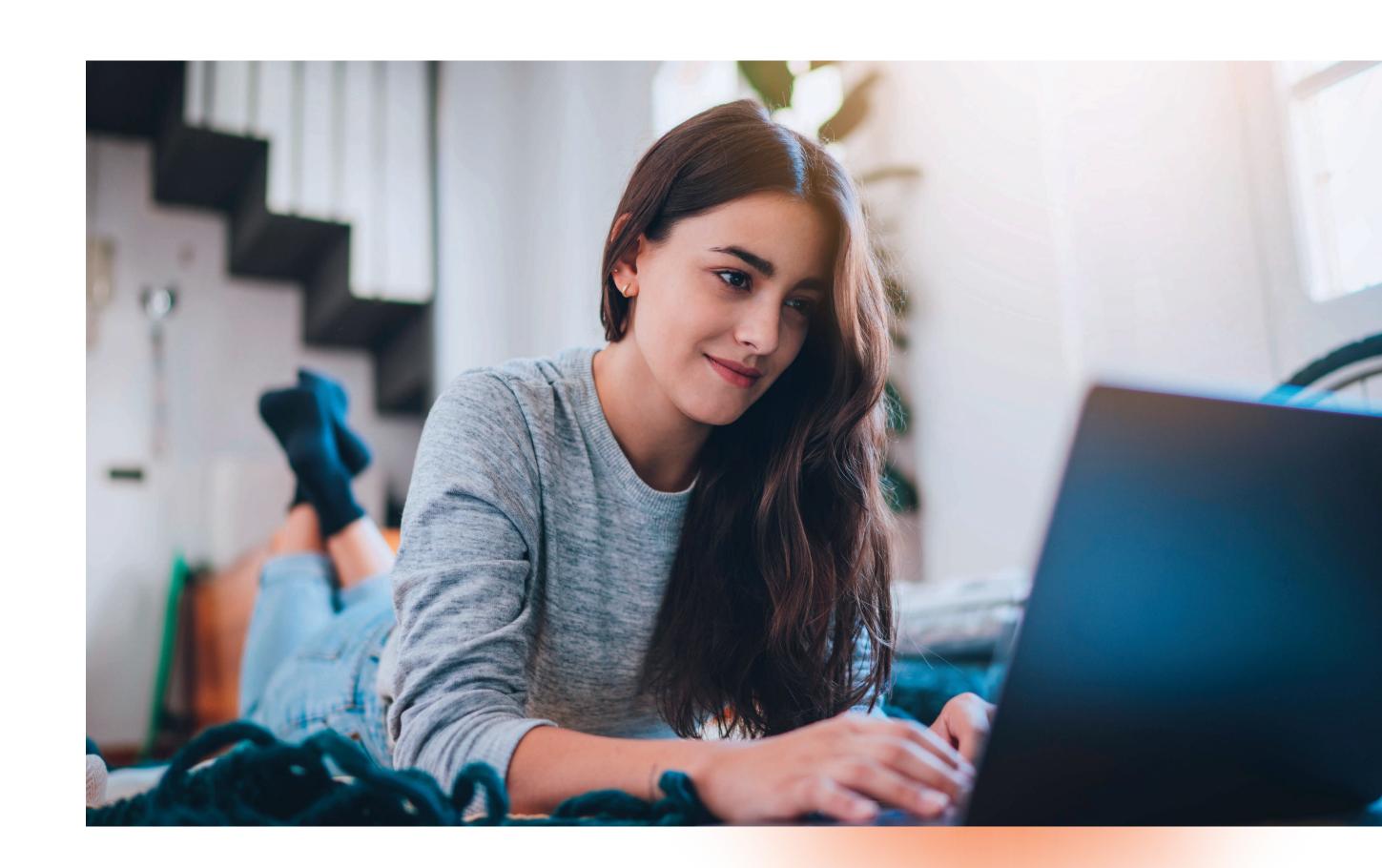
→ OUTSIDE EMPLOYMENT

Taking employment or running a business outside employment with Azentio, in your own time, with or without remuneration, could **interfere with your** ability to work effectively at Azentio or create a conflict of interest.

Any such activity must not be with any customer, supplier, distributor or competitor of Azentio.

Employees must notify and seek prior written approval from the Chief People Officer for any such activity as per above 'Conflicts of Interest' clause of this Code and in accordance with other applicable company policies and local law.





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→ FINANCIAL INTEGRITY AND RESPONSIBILITY

Any books and records we create or maintain, including financial accounting, partner / customer discounting, support records, sales paperwork, service and warranty records, IT documentation, and many more, should be created with **integrity and contain honest and reliable** information.

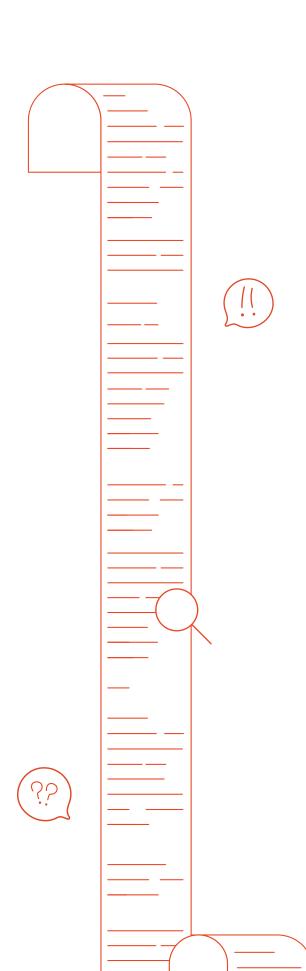


This means we:

Create business and financial records that are accurate, complete, objective, relevant, timely, and understandable

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- Communicate honestly in connection with every proposal, bid, and contract negotiation with third parties
- Do not falsify business documentation, whether for personal gain or another reason
- Only enter into agreements or commitments on behalf of **Azentio** when we have the required authority, and only enter into agreements that contain terms to which Azentio can adhere
- Create records that accurately reflect all the terms of the agreement
- Include all important facts and do not deliberately omit or misrepresent key information



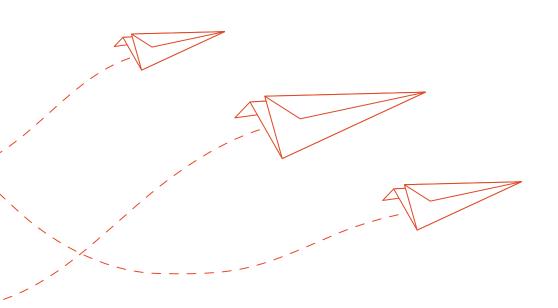
→ ACCOUNTABILITY FOR MANAGERS

As leaders, managers cultivate a collaborative environment, drive accountability and ethical behaviors.



As a manager, one should:

- Ensure that the people in their team completely understand
 Azentio's way of working, policies, and the Code
- Ensure that an environment is created where employees in their team are comfortable raising ethical and compliance issues without fear of retaliation
- Anticipate, prevent and evaluate compliance risks.
 Employees in their team should never be encouraged to achieve business results at the expense of compromising on the Code
- Respond to questions and concerns from their team patiently and ask for additional information where needed
- Report any violations that have been brought to your attention, within or outside the team, immediately to the HRBP or Legal Department



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→ CONCLUSION

The Code does not provide a comprehensive and complete explanation of all expectations from company's standpoint. Employees have a continuing obligation to familiarize themselves with applicable law, advisories, policies and procedures as relevant.

Failure to follow the Code can result in disciplinary action, including termination of employment.



For any **guidance on interpretation of the Code,** you may seek support from your reporting manager; HRBP; or Legal Department.



Employee Policy Certification

anti-bribery anti-corruptionpolicy

- INTRODUCTION
- OUR POLICY
- RELATIONSHIPS WITH THIRD PARTIES
- RECORDKEEPING AND INTERNAL CONTROLS
- COMPLIANCE PROCEDURES AND TRAINING
- REPORTING REQUIREMENTS AND WHISTLEBLOWER PROTECTION



→ INTRODUCTION

Azentio Software Private Limited, including its subsidiaries, affiliates and group companies (collectively, "Azentio" or the "Company"), is committed to conducting all aspects of its business in keeping with the highest legal and ethical standards and expects all employees and other persons acting on its behalf to uphold this commitment. In accordance with this commitment, Azentio has adopted this Anti-Bribery and Anti-Corruption Policy (the "Policy"), which is applicable to all directors, officers, employees, agents, distributors, vendors, representatives, and other associated persons of Azentio (collectively "Azentio Personnel").

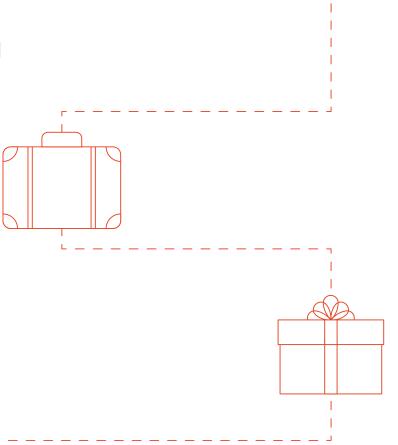
In brief, Azentio will **not tolerate bribery, kickbacks, or corruption of any kind,** either directly or indirectly through third parties, whether or not explicitly prohibited by this Policy or by law. Azentio Personnel are **not permitted to give or offer anything of value** (including gifts, hospitality, or entertainment) to anyone for the purpose of improperly obtaining or retaining a business advantage. Similarly, Azentio Personnel may not solicit or accept any such improper payments.



This Policy and the internal controls herein have been designed to prevent bribery from occurring, avoid the appearance of wrongdoing and enable Azentio to respond promptly and effectively to any inquiries about its conduct. Azentio employees who violate this Policy may be subject to disciplinary action, up to and including termination.

The pages that follow provide a **general guide to anti-corruption compliance**but do not address every potential scenario that may implicate Azentio.









→ OUR POLICY

Azentio Personnel shall not be permitted to pay or receive bribes.

Azentio Personnel must **conduct their activities in full compliance** with this Policy, local laws and all applicable anti-corruption laws, including but not limited to Singapore Prevention of Corruption Act, 1993, India Prevention of Corruption Act, 1988, the UK Bribery Act and the United States Foreign Corrupt Practices Act ("FCPA").

Under this Policy, Azentio Personnel are **not permitted to give or offer anything of value,** directly or indirectly, to any Government Official or any commercial party for the purpose of improperly obtaining or retaining a business advantage. **"Anything of value"** should be broadly interpreted to include cash, cash equivalents, gifts, forgiveness of a debt, loans, personal favors, entertainment, meals and travel, political and charitable contributions, business opportunities, promise of employment to kith or kin, medical care, among other items.



The term "Government Official" includes all officers or employees of a government department, agency or instrumentality; permitting agencies; customs officials; candidates for political office; and officials of public international organizations (e.g., the Red Cross). This term also includes officers or employees of government-owned or controlled commercial enterprises such as state-owned or controlled universities, airlines, oil companies, banks, health care facilities or other vendors. The term also includes family members and close associates of such individuals (e.g., it is not permissible to give a lavish gift to the sibling, spouse or child of a government employee if a gift to the individual would be prohibited under this Policy).



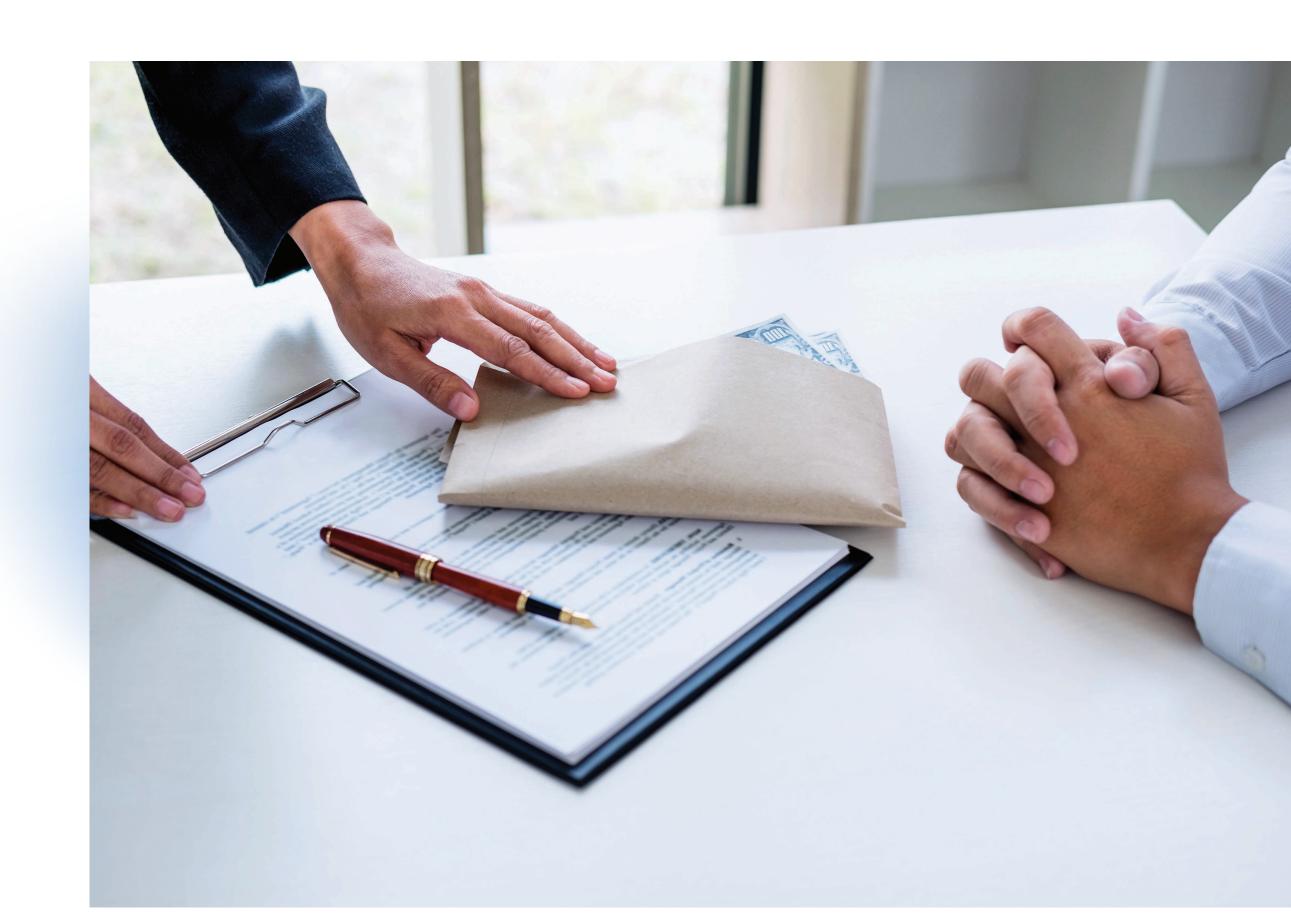
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Similarly, Azentio Personnel may not solicit or accept such payments.

If confronted with a request or demand for an improper payment or other violation of this Policy, the request or demand must be immediately rejected and reported to the General Counsel. Similarly, if any employee or agent knows or believes that an improper payment has been or will be made, the employee or agent must also report such payment to the General Counsel. Azentio's policy is that **no adverse employment action will be** taken against any personnel in retaliation for, honestly and in good faith, reporting a

violation or suspected violation of anti-corruption laws or this Policy.





This Policy sets forth various rules relating to gifts, entertainment, travel, meals, lodging and employment. All such expenditures must be recorded accurately in the books and records of the Company.

Gifts

As a general matter, the Company competes for and earns business through the quality of its products and services, not with gifts or lavish entertainment. The use of Company funds or assets for gifts, gratuities, or other favors to Government Officials or any other individual or entity (in the private or public sector) that has the **power to decide or** influence the Company's commercial activities is prohibited, unless <u>all</u> of the following circumstances are met:

- The gift does **not involve cash or cash equivalent gifts** (e.g., gift cards, store cards or gambling chips)
- The gift is **permitted under both local law and the guidelines** of the recipient's employer
- The gift is **presented openly with complete transparency**
- The gift is **properly recorded in the Company's books** and records
- The gift is provided as a token of esteem, courtesy or in return for hospitality and should comport with local custom
- The item costs less than \$25 USD for Government Officials and \$50 USD for commercial customers



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Gifts that do not fall specifically within the above guidelines require advance consultation and approval by the General Counsel.

Note that the provision of gifts, as well as the reporting requirements, in this Policy, apply even if Azentio Personnel are not seeking reimbursement for the expenses (i.e., paying these expenses out of your own pocket does not avoid these requirements).

Azentio Personnel must not accept or permit any member of his or her family to accept any gifts, gratuities or other favors from any customer, supplier, vendor, reseller or other person doing or seeking to do business with the Company, other than items of nominal value. Any gifts that are not of nominal value should be returned immediately and reported to your supervisor. If immediate return is not practical, they should be handed over to the Company for charitable disposition.





Meals, Entertainment, Travel and Lodging

Common sense and moderation should prevail in business entertainment and the payment of travel and lodging expenses engaged in on behalf of the Company. Azentio Personnel should provide business entertainment to or from anyone doing business with the Company only if the entertainment is infrequent, modest and intended to serve legitimate business goals.

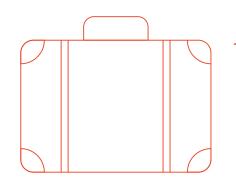
Meals, entertainment, travel and lodging should never be offered as **a means** of influencing another person's business decision. Each should only be offered if it is appropriate, reasonable for promotional purposes, offered or accepted in the normal course of an existing business relationship, and if the primary subject of discussion or purpose of travel is business. The appropriateness of a particular type of entertainment, travel and lodging of course, depends upon both the reasonableness of the expense and on the type of activity involved. This is determined based on whether or not the expenditure is sensible and proportionate to the nature of the individual involved. Adult entertainment is strictly prohibited.

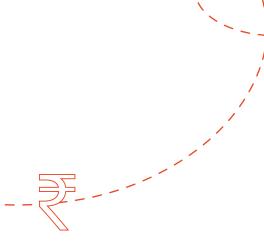
Expenses for meals, entertainment, travel and lodging for Government

Officials or any other individual or entity (in the private or public sector)

that has the power to decide or influence the Company's commercial
activities may be incurred without prior approval by the General Counsel
only if <u>all</u> of the following conditions are met:

- The expenses are bona fide and related to a legitimate business purpose and the events involved are attended by appropriate Company representatives;
- The cost of the meal, entertainment, travel or lodging is
 less than US \$25 for Government Officials and US \$50 for
 commercial customers per person
- The meal, entertainment, travel or lodging is permitted
 by the rules of the recipient's employer (if applicable).





For all such expenses, the reimbursement request must identify total number of all attendees and their names, employer, and titles (if possible). All expense reimbursements must be supported by receipts, and expenses and approvals must be accurately and completely recorded in the Company's records. In all instances, Azentio Personnel must ensure that the recording of the expenditure associated with meals, lodging, travel or entertainment clearly reflects the true purpose of the expenditure.

Note that the provision of meals, entertainment, travel and lodging as well as the reporting requirements, in this Policy, apply even if Azentio Personnel are not seeking reimbursement for the expenses (i.e., paying these expenses out of your own pocket does not avoid these requirements).



When possible, meals, entertainment, travel and lodging payments should be made directly by the Company to the provider of the service and should not be paid as a reimbursement. Per diem allowances may not be paid to a Government Official or any other individual (in the private or public sector) that has the power to decide or influence the Company's commercial activities for any reason.

Any meal, entertainment, travel or lodging expense greater than US \$25 for Government Officials and US \$50 for commercial customers per person and any expense at all that is incurred for meals, entertainment, travel or lodging unrelated to a legitimate business purpose, must be pre-approved by the General Counsel.



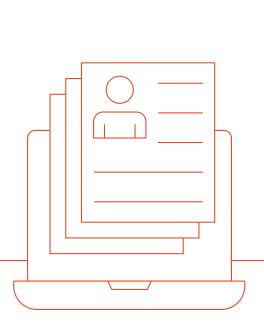
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Employment/Internships

On occasion, Government Officials or Azentio's business partners may request that Azentio provide internships or employment to certain individuals.

Offering internships or employment to anyone on the request of a Government Official or Azentio's client or business partner may be viewed as providing an item of value.

This Policy sets forth guidance for handling such requests from Government Officials or Azentio's clients or business partners. If a candidate is interviewed for an internship or employment within the ordinary course of filling a position, the General Counsel must be notified of the candidate's relationship to a Government Official or Azentio's business partner. If a candidate related to a Government Official or Azentio business partner is interviewed outside of the ordinary course of filling a position, any internship or employment offer must be pre-approved by the General Counsel.





Political Contributions and Charitable Donations

Azentio Personnel may not make political or charitable donations, whether in their own name or in the name of Azentio, to obtain or retain business or to gain an improper business advantage. Any political or charitable contributions by Azentio must be permitted under the law, permissible pursuant to the terms of this Policy, made to a bona fide organization, and in the case of political contributions or charitable contributions connected to any Government Official or government entity made with the prior approval of the General Counsel.

In certain instances where there is heightened risk of corruption,

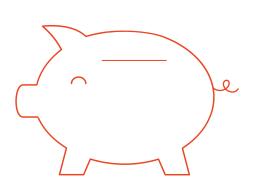
the General Counsel may require diligence to be conducted.

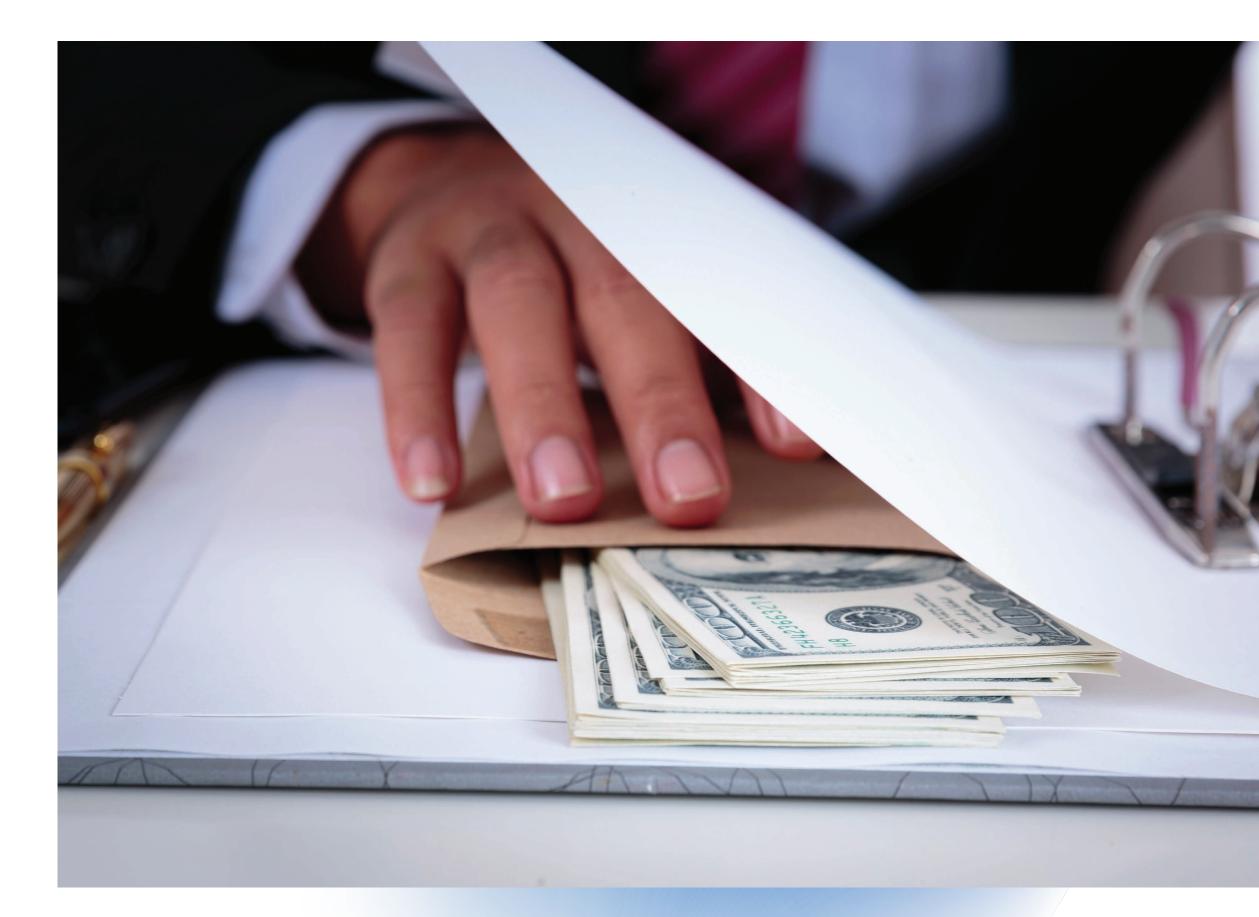
The General Counsel must be notified if a Government Official solicits a political or charitable contribution in connection with any government action related to Azentio or its affiliates. **Individual employees or agents may not make political contributions on behalf of Azentio.**









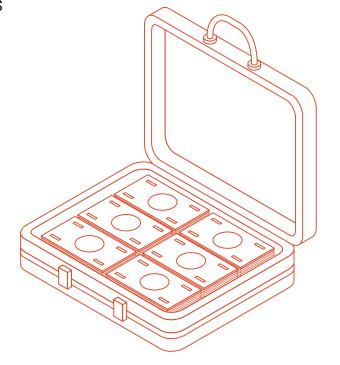


→ RELATIONSHIPS WITH THIRD PARTIES

Anti-corruption laws prohibit indirect payments made through a third party, including giving Anything of Value to a third party while knowing that value will be given to a Government Official for an improper purpose.

Therefore, Azentio Personnel should avoid situations involving third parties that might lead to a violation of this Policy.

reasonable precautions to ensure that the third parties conduct business ethically and comply with this Policy. Such precautions may include, for third parties representing Azentio before governmental entities, conducting an integrity due diligence review of a third party, inserting appropriate anti-corruption compliance provisions in the third party's written contract, requiring the third party to certify that it has not violated and will not violate this Policy and any applicable anti-corruption laws during the course of its business with the Company, and monitoring the reasonableness and legitimacy of the services provided by and the compensation paid to the third party during the engagement. Azentio Personnel retaining third parties that will be representing Azentio before governmental entities or will be marketing or selling Azentio's products or services must take formal written approval from the Legal Department prior to hiring the third party.



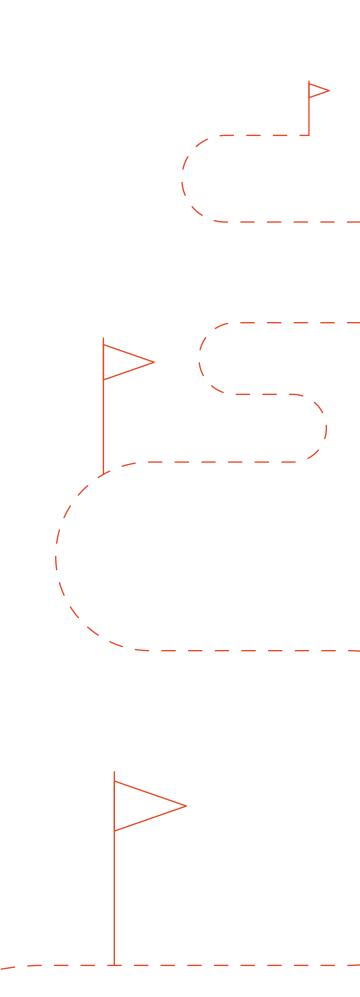


In addition, once a third party is engaged, Azentio Personnel who deal with third parties must **always be aware of potential red flags**. Red flags are certain actions or facts which should alert a company that there is a high possibility of improper conduct by a third party. A red flag does not mean that something illegal has happened, but rather that further investigation is necessary. Red flags are highly fact-dependent, but **some examples of red flags are:**

- Unusual or excessive payment requests, such as requests
 for over-invoicing, up-front payments, ill-defined or
 last-minute payments, success fees, unusual commissions or
 mid-stream compensation payments
- Requests for payments to an account in a country other than where the third party is located or is working on behalf of the Company
- Requests for payment to another third party, to a numbered account, or in cash or other untraceable funds
- Requests for political or charitable contributions

- The third party is related to a Government Official or has a close personal or business relationship with a Government Official
- Any refusal or hesitancy by the third party to disclose its owners, partners or principals
- The third party uses holding companies or other methods to obscure its ownership, without adequate business justification
- The third party expresses a desire to keep his representation of the Company or the terms of his retention secret
- The third party has little experience in the industry but claims to "know the right people"

If Azentio Personnel have reason to suspect that a third party is engaging in potentially improper conduct, they shall **report the case to the General Counsel immediately.** Azentio shall conduct an investigation and stop further payments to the third party if Azentio's suspicions are verified through the investigation.





→ RECORDKEEPING AND INTERNAL CONTROLS

This Policy requires that all expenditures made by the Company are accurately reflected in the Company's financial records and that all payments made with Company funds, or on behalf of the Company, have been properly authorized.

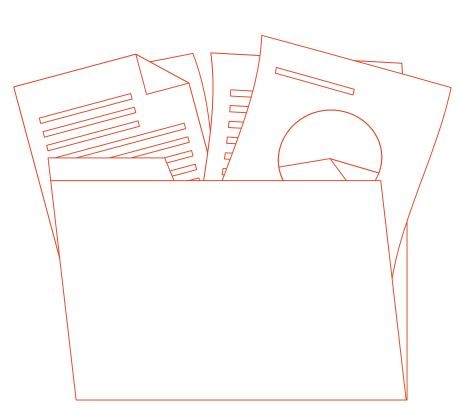
Azentio Personnel must follow all applicable standards, principles, laws and practices for accounting and financial reporting.

Azentio Personnel must be timely and complete when preparing all reports and records required by management. In particular, Azentio Personnel should ensure that no part of any payment is to be made for any purpose other than that to be fully and accurately described in Azentio's books and records. Azentio Personnel should use best efforts to ensure that all transactions, dispositions, and payments involving Company funds or assets are properly and accurately recorded in the Company's financial records.

No undisclosed or unrecorded accounts are to be established for any purpose. False or artificial entries are not to be made in Azentio's books and records for any reason. Finally, personal funds must not be used to accomplish what is otherwise prohibited by this Policy.

Employee Policy Certification

The General Counsel is primarily responsible for the oversight and enforcement of this Policy. The Company will conduct periodic audits of its books and records to monitor compliance with this Policy.



→ COMPLIANCE PROCEDURES AND TRAINING

As part of Azentio's ongoing commitment to anti-corruption compliance, all employees must receive and review a copy of this Policy. All such employees must then certify in writing that they (1) have reviewed the Policy; (2) agree to abide by the Policy; and (3) agree to report any potential violations of the Policy to the General Counsel.

In addition, the Company will offer **periodic anti-corruption compliance training programs** to educate employees about the requirements and obligations of anti-corruption laws and this Policy.





→ REPORTING REQUIREMENTS AND WHISTLEBLOWER PROTECTION

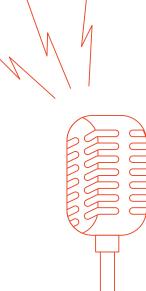
Azentio takes its **commitment to anti-corruption compliance** very seriously and expects all Azentio Personnel to share that commitment. Azentio therefore expects and requires any Azentio Personnel who have knowledge of, or reason to suspect, any violation of this Policy to contact the General Counsel immediately.

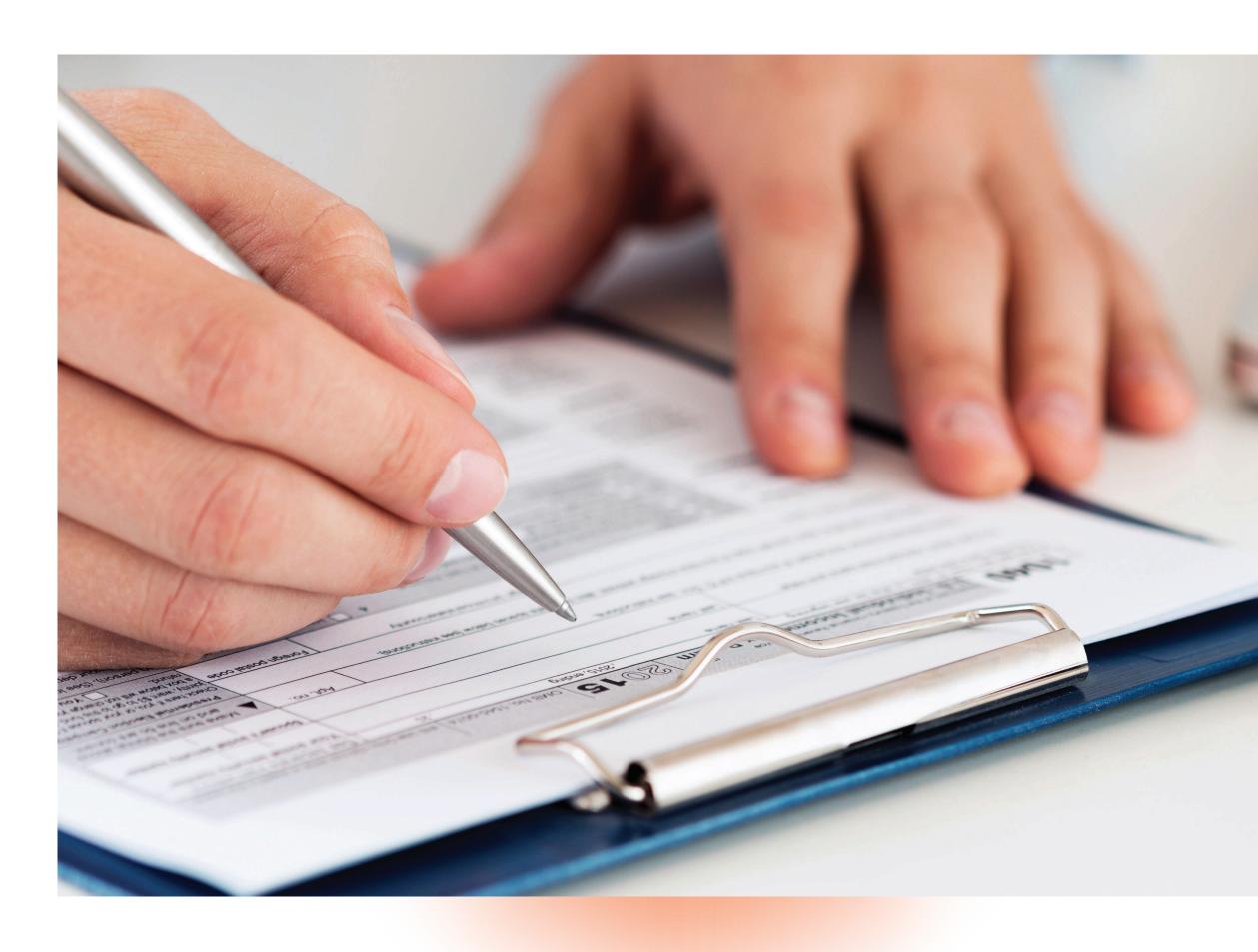
Reports may be made anonymously.

If any Azentio Personnel fail to report known or suspected violations, then the relevant Azentio Personnel may be subject to **disciplinary action**, **up to and including termination**.

It is Azentio's policy that, if the report of known or suspected violations is made honestly and in good faith, no adverse employment-related action will be taken against any Azentio Personnel in retaliation for reporting a violation or suspected violation of anti-corruption laws or this Policy.

All questions regarding this Policy should be directed to the General Counsel.







→ EMPLOYEE ANTI-BRIBERY ANTI-CORRUPTION POLICY CERTIFICATION

This is to acknowledge that I have received, read and fully understood the Company's Code and Anti-Bribery and Anti-Corruption Policy (the "Policy") and will keep myself abreast on the latest updated versions of the Code and the Policy from time to time. I agree to comply with all the rules contained therein. I agree to report any potential violations to the General Counsel. I will participate in the Company's anti-corruption training on a periodic basis. I understand that failure to comply with the Policy, the FCPA, U.K. Bribery Act and any other applicable anti-corruption laws may result in immediate termination and prosecution, with penalties including fines and/or imprisonment. Should I have any questions regarding the Policy or find any deviations or violations, I will contact the General Counsel immediately.

<u>Click here</u> to confirm that you have read, understood and agree to abide by the terms of the policy.



AZENTIO

Code of Ethics and Business Conduct

For raising concerns or queries or reporting cases, please reach out to LegalCompliance @Azentio.com This is the current version of the Azentio Software Code of Ethics and Business Conduct, updated in 2021



Azentio Software Private Limited