



Code of Ethics and Business Conduct Policy

Policy Number: CORP-POL-01148

Policy Owner: Chief Operations Officer

Contacts: Legal & Compliance (legal@vybond.com), Human Resources

Confidential Reporting: Paycom Ethics Helpline (24/7, anonymous). Vybond strictly prohibits retaliation against anyone who, in good faith, reports a concern, raises a question, or participates in an investigation. This protection is further detailed in [Vybond's Non-Retaliation Policy CORP-POL-00020](#).

This Code of Ethics and Business Conduct Policy (this "Policy") serve as both a summary and a roadmap; the Vybond policies referenced or referred to in this Policy govern where such policy or policies provide more specific guidance or requirements. Please refer to the referenced Vybond policies for full details.

Purpose

At Vybond, ethical conduct is the foundation of everything we do. The purpose of this Policy is to promote a respectful, safe, and compliant workplace, and point Personnel to the controlling policies that govern their conduct, decision-making, and recordkeeping. At Vybond, we believe that a positive workplace culture as well as culture of integrity, respect, and accountability contributes directly to our success as a company – and to the well-being of the employees, customers, partners, and communities we serve.

Scope and Applicability

This Policy applies to all Vybond entities worldwide and to all directors, officers, employees, temporary personnel, agents, contractors, third-party representatives, intermediaries, and business partners acting on Vybond's behalf (collectively, "Personnel"). Where there is a conflict between applicable law and this Policy or a Vybond policy referenced herein, Personnel must follow the more protective standard. If local law is less restrictive than this Policy, Personnel are expected to meet the higher requirements of this Policy, unless prohibited by applicable law.

Vybond Policies

1) Ethics & Social Responsibility

- a) **Anti-Trust & Free-Competition:** Personnel shall abide by [Vybond's Antitrust & Competition Policy CORP-POL-00038](#). Antitrust laws exist to preserve free and competitive markets. Vybond embraces a free and open marketplace and, while we will compete vigorously, we are committed to complying with competition laws, also called antitrust laws, in every country where we do business. Personnel must never engage in conduct that undermines fair competition in violation of applicable laws.
 - i) **Prohibited Conduct:** Personnel must not agree—formally or informally—with competitors on prices, bids, discounts, credit terms, market or customer allocation, or output. The exchange of sensitive commercial information (such as pricing, margins, costs, pipeline date and/or business strategy) with competitors is strictly prohibited.



- ii) Trade Associations/Industry Events: Personnel attending trade association meetings or industry events must obtain Legal & Compliance preclearance for agendas; maintain meeting notes; leave immediately if discussions drift into prohibited topics. Any such occurrence must be promptly reported.
 - iii) Questions and Escalation: Direct any questions regarding competition law compliance to Legal & Compliance.
 - iv) Recordkeeping: All records shall be maintained in accordance with Vybond's [Records Retention and Destruction Policy CORP-POL-00023](#).
- b) **Anti-Bribery, Anticorruption:** Personnel shall abide by Vybond's [Anti-Bribery and Anticorruption Policy CORP-POL-00017](#). Vybond maintains a zero-tolerance policy toward bribery and corruption in all forms. No bribes, kickbacks, or facilitation payments are permitted (even where local law nominally allows or excuses such payments). "Anything of value" is interpreted broadly and includes cash or cash equivalents (gift cards), gifts, travel, hospitality, donations, sponsorships and employment offers.
- i) Government Officials: Personnel are prohibited from providing gifts, hospitality, or payments of any kind to government officials. Charitable donations connected to government officials require prior Legal & Compliance approval.
 - ii) Third Party Diligence: All third parties must undergo appropriate due diligence and use compliant contracts. Onboarding must follow Anti-Bribery and Anticorruption (ABAC) procedures, including documented third-party sanctions/denied-party screening and re-screening.
 - iii) Gifts & Hospitality: Gift and hospitality provided to commercial parties must comply with Vybond's [Gifts & Entertainment Policy CORP-POL-00022](#), which sets a threshold of \$75 USD. Gifts must be reasonable, business-related, and never provided during active bidding periods, Pre-approved is required were applicable, and all gifts must be logged in accordance with Vybond's [Records Retention and Destruction Policy CORP-POL-00023](#).
- c) **Compliance with Laws & Reporting:** Personnel must comply with all applicable laws, rules, and regulations that govern Vybond's business conduct. There is no circumstance in which criminal conduct by Personnel will be considered to be within the scope of such Personnel's employment or authority. Because the distinction between criminal conduct and conduct that may violate a civil statute is not always clear, if Personnel know of any act or activity by other Personnel that violate, or that appear to violate, any provision of this Policy, such Personnel is encouraged to report such conduct. Reports can be made through established reporting relationships or through the confidential reporting procedures described below.
- i) Questions should be directed to your manager, HR, or Legal & Compliance. Report concerns via managers, Legal, HR, or the Paycom Ethics Helpline (anonymous, 24/7).
 - ii) Vybond prohibits retaliation for good-faith reports and participation in investigations per Vybond [Non-Retaliation Policy CORP-POL-00020](#). All reports and investigations will be handled with appropriate confidentiality to the extent possible, consistent with Vybond's legal and ethical obligations.



- d) **Conflicts of Interest:** Personnel shall abide by Vybond's [Conflicts of Interest Policy CORP-POL-00044](#). Personnel must remain free from personal, financial, or other influences that could compromise—or appear to compromise—their ability to act in Vybond's best interests. All business decisions and interactions with customers, suppliers, vendors, and other third parties must be made objectively and without favoritism, bias, or personal benefit.
 - i) Vybond respects the privacy of its Personnel; however, this must be balanced with Vybond's obligation to uphold the highest standards of ethical business conduct. Personnel are expected to avoid any situation in which their personal or financial interests conflict, or could reasonably be perceived to conflict, with their responsibilities to Vybond.
 - ii) Except as described below, Personnel may not hold a material financial interest in, be employed by, consult for, or serve as a director, officer, or similar representative of any competitor, customer, or supplier without disclosing the relationship to Vybond. If no reasonable alternative source exists for the required goods or services, a supervisor may authorize the transaction provided it is conducted transparently and on a competitive and commercially appropriate terms.
 - iii) Officers and non-Board Personnel are prohibited from:
 - (1) Taking personal advantage of business opportunities that belong to Vybond or that arise through the use of Vybond's property, information, or position; and
 - (2) Using Vybond's property, information, or position for personal gain.
 - iv) All Personnel have a continuing duty to promote and protect Vybond's legitimate business interests and to disclose potential conflicts promptly so they may be evaluated and addressed appropriately.

- di) **Business Practices:** Personnel shall abide by Vybond's [Global Trade Compliance Policy CORP-POL-00039](#).
 - i) **Anti-Boycott Laws:** Vybond and its affiliates must not participate in or cooperate with foreign boycotts not sanctioned by the United States.
 - ii) **Sanctions Compliance:** Vybond will not engage in business with individuals, entities, or countries subject to U.S., EU, UK, or other applicable sanctions or embargoes. Personnel must screen transactions and counterparties against relevant sanctions lists (e.g., OFAC, EU Consolidated List).
 - (a) **Export Controls:** Personnel must comply with U.S. Export Administration Regulations (EAR), International Traffic in Arms Regulations (ITAR), and equivalent global trade control laws. This includes restrictions on transferring controlled technology, software, or products to unauthorized parties.
 - iii) **Reporting:** Any request to participate in a boycott, or any suspected violation of sanctions or export control laws, must be reported immediately to Legal & Compliance.

- dii) **Data Privacy:** Vybond takes our obligations regarding privacy and data protection seriously. Vybond Personnel shall respect the intellectual property and confidential information of third parties.



- i) Each employee has an obligation to comply with applicable privacy and data protection laws including GDPR, CCPA, HIPAA, etc.
 - ii) Personnel must follow Vybond's relevant IT policies including, but not limited to: [Information Protection Policy CORP-POL-00027](#), [Acceptable Use Policy CORP-POL-00030](#), [Incident Response Policy CORP-POL-00028](#), and [Records Retention and Destruction Policy CORP-POL-00023](#).
 - iii) Information shall be collected for legitimate business purposes only, and care shall be taken to secure it.
 - iv) Report suspected security or privacy incidents within 24 hours via the Security portal or the hotline.
- g) **Fair Dealing:** Personnel must deal fairly with customers, suppliers, competitors, other Personnel, and shareholders. Personnel should not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair dealing practice.
- h) **Financial & Accounting Practices and Controls**
- i) Accurate financial records are essential to Vybond's integrity and regulatory compliance. Personnel must report any knowledge or suspicion of the following circumstances:
 - (1) a transaction is about to be, or has been, executed on behalf of Vybond by an employee or agent of Vybond that was not in accordance with management's specific or general authorization, with respect to that specific category of transaction, as specified in the system of accounting controls;
 - (2) a transaction was not properly recorded on the books, records and accounts, the result of which would prevent financial statements from being prepared in conformity with generally accepted accounting principles and would not maintain the accountability of assets;
 - (3) access to assets was given to, or taken by, an employee or agent of Vybond that was not in accordance with management's general or specific authorization as specified in the internal accounting controls of Vybond; or
 - (4) the recorded accountability for certain Vybond assets is not compared with the existing assets at such intervals as specified in the system of internal accounting controls, or appropriate entries were not made on the books, records, and accounts, if such comparisons indicate differences.
 - ii) Personnel must report any knowledge or suspicion of any instance where Vybond or any individual acting on behalf of Vybond maintains a bank account for or on behalf of Vybond in a name other than name, or of a corporate bank account whose existence is not known to the appropriate financial officers or is not reflected in the books and records.
 - iii) Personnel must give full and accurate information in response to any inquiry by an internal auditor, or accountant, or a representative of Vybond's independent accountant, and shall provide such auditors and accountants with all records and documents requested.



- iv) Personnel must comply with Vybond’s published financial policies and procedures.

- i) **Inside Information & Securities Trading:** Personnel may become aware of material nonpublic information regarding the business, operations or securities in the course of their work. Material nonpublic information is information that would reasonably affect an investor’s decision to buy, sell or hold securities and that has not been disclosed generally to the public. United States securities laws prohibit the trading of securities on the basis of material nonpublic information (often called “inside information”). In addition, Vybond Personnel are prohibited from recommending, “tipping” or suggesting that anyone else buy or sell stock or other securities of Vybond or other companies with which Vybond has significant relationships on the basis of material nonpublic information.
 - i) Personnel must not acquire any securities of any entity they know is the object of, or involved in, a prospective transaction without first disclosing such acquisition to Human Resources or Legal, and each employee must understand that such activity may be a violation of state and federal securities laws. If an employee has authority to recommend or decide whether Vybond should make the prospective transaction or occupies a position with Vybond involving the evaluation of the prospective transaction in which he or she has a financial or personal interest, the employee shall promptly notify Human Resources or Legal of his or her financial or personal interest.
 - ii) Personnel must not use or disclose any confidential or nonpublic information about Vybond’s intention to acquire, invest in or enter into business relationships with any unaffiliated third party, except for disclosure to those Vybond Personnel who have the need to know in order to perform their duties; nor shall an employee disclose trade secrets, proprietary product information, or confidential financial data of Vybond to any person, other than authorized Vybond Personnel or as required by law, irrespective of whether knowledge of such information and data is acquired as a result of his or her duties and responsibilities or is otherwise acquired.

- j) **Protection & Personal Use of Vybond Resources:** Personnel must comply with Vybond’s [Acceptable Use Policy CORP-POL-00030](#). Personnel must not use or allow others to use funds, proprietary business and technical information of Vybond (or that of third parties in Vybond’s possession), personnel, facilities, materials or equipment of Vybond for personal purposes that are unrelated to, or not intended to further, the business unless prior approval is obtained from a manager (or such manager’s designee) who is accountable and responsible for the Vybond property proposed to be used. Personnel must protect such resources against theft, carelessness and waste, and ensure their efficient use.

- k) **Protection of Intellectual Property:** Vybond’s intellectual property—including trade secrets, proprietary processes, product formulations, designs, technical data, software, research, business strategies, and all other confidential or proprietary information—represents one of our most valuable assets. Every employee, contractor, and third-party partner entrusted with Vybond information bear responsibility for protecting it from unauthorized use, disclosure, loss, or misuse.



- i) Personnel must use Vybond intellectual property only for legitimate business purposes and never for personal gain or the benefit of any third party.
- ii) All proprietary information must be accessed, stored, transmitted, and disposed of securely, consistent with Vybond policies, including IT and Acceptable Use requirements.
- iii) Sharing of confidential or proprietary information must be limited to individuals who are authorized and have a business need to know.
- iv) Personnel must follow all Vybond requirements for encryption, secure storage, confidentiality markings, and approved communication tools.
- v) Immediately report any suspected loss, misuse, or unauthorized disclosure of Vybond's intellectual property.

Personnel must respect the intellectual property rights of others. This includes adhering to:

- i) Licensing terms for software, data, and digital tools;
- ii) Contractual restrictions related to suppliers, customers, and partners;
- iii) Prohibitions on copying, disclosing, or using third-party confidential information without permission.

Personnel must never:

- i) Upload or input Vybond or third-party proprietary information into unapproved external platforms, including artificial intelligence tools, cloud applications, or storage sites, unless explicitly authorized.
- ii) Misrepresent ownership or source of any materials, data, or creative content used in Vybond work.

Any inventions, discoveries, improvements, creative works, or other work product created by employees in connection with their job duties, use of company resources, or within the scope of Vybond business are the property of Vybond. Employees may be required to execute documentation confirming Vybond's ownership in accordance with applicable laws.

Employees' duties to safeguard Vybond's intellectual property and confidential information continue after employment ends. Departing employees must:

- i) Return all materials containing confidential or proprietary information;
- ii) Refrain from retaining or reproducing Vybond data or documents;
- iii) Continue honoring all confidentiality and inventions-assignment obligations.

2) Labor, Employment, and Safety

- a) **Global Human Rights:** Personnel must comply with Vybond's [Global Human Rights Policy CORP-POL-00021](#). Vybond places the highest priority on social responsibility toward employees and all individuals impacted by our operations. Personnel are expected to:



- i) Operate ethically and foster business practices that improve their workplace, community, and society.
 - ii) Prevent involvement in human rights violations under any circumstances.
 - iii) Comply with all applicable laws and standards governing labor, human rights, and ethical conduct.
- b) **Prohibition of Modern Slavery, Forced Labor & Human Trafficking:** Personnel must comply with Vybond's [Forced and Child Labor Act Statement CORP-POL-00018](#). Vybond strictly prohibits all forms of modern slavery, human trafficking, forced labor, bonded labor, involuntary prison labor, and any form of labor obtained through coercion, intimidation, deception, or exploitation. Vybond does not tolerate the use of labor that is not freely chosen and expects the same commitment from all suppliers, contractors, and business partners.
- No individual may be employed or engaged under threat of penalty, violence, retention of personal documents, restriction of freedom of movement, or any other form of coercion. All workers must have the right to terminate their employment freely, in accordance with applicable laws and reasonable notice requirements.
- All recruitment must be conducted legally, ethically, and transparently. No worker may be charged recruitment or placement fees as a condition of employment. All terms of employment must be communicated in a language the worker understands before work begins.
- Vybond requires suppliers, agents, and business partners to uphold these same standards and to ensure that no forced, trafficked, or coerced labor is used at any stage of production, manufacturing, or distribution. Vybond reserves the right to audit or request evidence of compliance and may terminate relationships with any party that fails to meet these expectations (see Vybond's [Supplier Code of Conduct CORP-POL-00049](#)).
- c) **Anti-Discrimination and Anti-Harassment:** Personnel must comply with Vybond's [Anti-Harassment, Anti-Discrimination Policy CORP-POL-00041](#) and [Workplace Bullying Policy CORP-POL-00042](#). Vybond is committed to providing a workplace that is respectful and free from all forms of unlawful discrimination and harassment. Vybond's commitment to fairness and mutual respect prohibits discrimination and harassment of Vybond Personnel, candidates for employment, suppliers or customers. All relationships among individuals employed by or conducting business on behalf of Vybond must be business-like and free of bias, prejudice, and harassment.
- i) Harassment (including sexual harassment and harassment based on a legally-protected characteristic) occurs when unwelcome conduct creates a hostile or offensive work environment or is implied to be a factor in employment or advancement decisions. Vybond does not tolerate and expressly prohibits discrimination, harassing actions or comments, inappropriate physical contact, sexual advances, or any other conduct that is intimidating or otherwise offensive or hostile. Incidents of harassment must be reported immediately to a supervisor and/or Human Resources.



ii) Vybond prohibits any actual or attempted reprisals or retaliation against an employee who raises a concern that this Policy has been violated. Vybond takes all allegations of discrimination, harassment, and retaliation very seriously. Anyone engaging in discrimination, harassment, or retaliation is subject to disciplinary action up to and including termination. Personnel are expected to be truthful in making complaints and participating in investigations.

d) **Diversity, Equity, and Inclusion:** Personnel must comply with Vybond's [Diversity, Equity & Inclusion Policy \(CORP-POL-00046\)](#), all Personnel are expected to contribute to an environment where all colleagues feel valued, included, and empowered to succeed.

Vybond strictly prohibits discrimination, harassment, bullying, exclusionary behavior, and any conduct inconsistent with a workplace that promotes equal opportunity and belonging. Personnel must act with professionalism, courtesy, and fairness in all interactions with colleagues, applicants, customers, suppliers, and business partners.

All Personnel share responsibility for supporting equitable workplace practices, including fair treatment, inclusive decision-making, and respect for the diverse perspectives and backgrounds of others. Leaders and managers have an elevated obligation to model inclusive behavior, support equitable access to opportunities, and respond promptly and appropriately to concerns.

e) **Bystander Intervention:** Personnel must comply with Vybond's [Bystander Intervention Policy CORP-POL-00045](#). Personnel are expected to speak up or take appropriate action when they observe conduct that may violate Vybond policies, including harassment, discrimination, bullying, retaliation, threats, unsafe behavior, or workplace violence. Bystanders may intervene directly when safe to do so, create a distraction to defuse the situation, seek help from a supervisor or HR, or promptly report concerns through any reporting channel, including the Paycom Ethics Helpline (24/7, anonymous).

Personnel are not required to place themselves at risk; safety must always come first. Vybond strictly prohibits retaliation against anyone who, in good faith, intervenes, raises a concern, or participates in an investigation, consistent with Vybond's Non-Retaliation Policy CORP-POL-00020.

f) **Workplace Violence and Firearms:** Personnel must comply with Vybond's [Workplace Violence and Firearms Policy CORP-POL-00043](#). Vybond believes that all Personnel should be treated with dignity and respect. Acts or threats of workplace violence—whether verbal, written, physical, or implied—are strictly prohibited. Vybond will respond promptly to all concerns and will not tolerate any conduct that jeopardizes the safety or well-being of employees, contractors, visitors, or others on Vybond premises.

i) Any potentially dangerous, threatening, or concerning situation must be reported immediately to a supervisor, Human Resources, Security (if applicable), or Legal &



Compliance. Personnel may also report concerns through the confidential Paycom Ethics Helpline (24/7).

- ii) Reports will be handled discreetly and information will be shared strictly on a need-to-know basis.
- iii) All reports will be assessed promptly. Vybond will conduct a fair, impartial, and confidential investigation. Vybond will promptly take appropriate steps to intervene whenever there is any indication of hostility, harassment, or emerging violent behavior.
- iv) Vybond maintains zero tolerance for workplace violence. Any employee who engages in violent or threatening behavior will be subject to disciplinary action up to and including termination.
- v) The following behaviors are strictly prohibited and may result in disciplinary action up to and including termination:
 - (1) Provoking, encouraging, or coercing any other person to engage in physical violence.
 - (2) Committing or attempting physical harm to any other person.
 - (3) Threatening, intimidating, or hostile conduct—verbally, physically, or through written, electronic, or digital communications—that creates a reasonable fear of injury or causes emotional distress.
 - (4) Displaying, brandishing, possessing, carrying, or concealing any firearm or weapon on Vybond property, in Vybond vehicles, or while conducting Vybond business, except as explicitly permitted by applicable law. Personnel must comply with all legal requirements and any Vybond-specific procedures governing such exceptions.

- g) **Drug and Alcohol-Free Workplace:** Personnel must comply with Vybond’s [Drug/Alcohol-Free Workplace Policy CORP-POL-00040](#). Vybond is committed to promoting a safe, healthy, and productive work environment for all Personnel. The use, possession, distribution or sale of illegal drugs, controlled substances without a valid prescription, or alcohol in violation of Vybond policy poses serious safety risks, impairs judgment, and undermines the integrity of our operations, products, and reputation.
 - i) Personnel must:
 - (1) Report to work fit for duty and free from impairment caused by drugs or alcohol.
 - (2) Not use, possess, sell, distribute, or be under the influence of illegal drugs or controlled substances on Vybond property, while operating Vybond vehicles, or while conducting Vybond business, unless expressly permitted by applicable law and Vybond policy.
 - (3) Inform HR if they are taking a lawfully prescribed medication that may impair their ability to perform essential job functions safely.
 - ii) Vybond encourages Personnel to come forward before an incident occurs if they believe they may have a substance-use issue. Personnel who voluntarily seek assistance will be treated with dignity and respect and may be eligible for leave, treatment programs, or return-to-work accommodations consistent with applicable laws and Vybond policy.
 - iii) Testing may be required under circumstances permitted by law and the Drug/Alcohol-Free Workplace Policy, including reasonable suspicion, post-incident, pre-



employment, or return to duty situations. Procedures for reasonable-suspicion evaluation, testing coordination, transportation, and confidentiality are described in supporting Vybond procedures. All information related to testing, results, or employee disclosures is treated with strict confidentiality and shared only on a need-to-know basis in accordance with applicable laws.

- iv) Examples of violations include, but are not limited to:
 - (1) Using, possessing, selling, distributing, or being under the influence of illegal drugs or unauthorized controlled substances while on Vybond premises or conducting Vybond business.
 - (2) Consuming alcohol during work hours or on Vybond property unless expressly authorized by leadership for approved functions.
 - (3) Reporting to work impaired or unfit for duty.
 - (4) Refusing to submit to required drug/alcohol testing when permitted under law and Vybond policy, consistent with published procedures.

h) **Employment Terms:** All Personnel without an employee agreement are at-will employees along with any Personnel party to an employment agreement that is for at-will employment according to its terms. This means that either the employee or Vybond may end the employment relationship at any time, for any reason or no reason, with or without notice. No person, except an authorized executive of Vybond, has the authority to enter into any employment agreement on Vybond's behalf, and such employment agreement must be in writing and signed by both an authorized executive of Vybond and the employee. Nothing in this Policy alters the at-will nature of this employment relationship.

i) **Environmental Compliance:** Vybond is committed to operating responsibly and minimizing our environmental impact. All Personnel share responsibility for protecting the environment, conserving natural resources, and supporting safe, compliant, and sustainable operations.

Vybond Personnel must:

- (1) Comply with all applicable environmental laws, regulations, permits, and Vybond requirements.
- (2) Consider environmental impacts when making decisions and conduct operations in a way that prevents pollution and protects air, water, land, and natural resources.
- (3) Use energy, water, and materials efficiently and seek opportunities to reduce waste and emissions.
- (4) Handle, store, and dispose of hazardous and non-hazardous waste safely and responsibly and in accordance with all laws applicable to hazardous substances.
- (5) Take precautions to prevent spills, releases, or other environmental harm, and avoid exposing Personnel, contractors, or the public to hazardous substances.
- (6) Follow site-specific emergency and environmental response procedures and report any incident, unsafe condition, or suspected noncompliance immediately.

No employee or agent may engage in, authorize, or ignore any activity that violate environmental standards or create unnecessary environmental risk. Personnel must speak



up if they observe practices that may harm people, the environment, or the communities in which Vybond operates.

Vybond also expects its suppliers and business partners to meet these environmental expectations by complying with all relevant laws, minimizing environmental impacts, and supporting responsible resource use, pollution prevention, and sustainable operational practices (see Vybond [Supplier Code of Conduct CORP-POL-00049](#)).

- j) **Occupational Health & Safety:** Vybond is committed to providing a safe and healthy workplace, free from recognized hazards that could cause death, serious injury, or illness. All Vybond Personnel share responsibility for maintaining safe working conditions and must follow applicable safety rules, posted instructions, written procedures, and all relevant Vybond policies.

Management Personnel must ensure that employees under their supervision comply with all occupational safety and health standards, regulations, and lawful directives, including those issued under the Occupational Safety and Health Act of 1970 and any other applicable laws. Personnel are required to perform their work in a manner that does not endanger themselves, coworkers, contractors, or visitors, and must promptly report any unsafe condition, near-miss incident, injury, illness, or deviation from established safety procedures to their supervisor, the on-site safety representative, Human Resources, or the plant manager. Personnel are also expected to actively participate in required safety training and adhere to all published safety procedures and operational guidelines.

- k) **Product Quality & Continuous Improvement**

- i) **Quality:** Vybond is committed to continuing its role of leadership in the industry and to a process of continuous improvement. Personnel must strive to ensure Vybond products consistently meet or exceed Vybond's own internal standards and the standards of Vybond's customers, as well as applicable safety laws, regulations, and industry standards.
- ii) **Improvement:** Vybond shall remain competitive in the industry by focusing on continuous improvement efforts to enhance business efficiency. Efforts should include increasing customer satisfaction through reduced costs, faster response times, and improved product quality. All Personnel must report quality issues, quality concerns, or quality non-conformities to their manager so that relevant issues may be addressed.

Violating this Policy

Violations of this Policy may result in severe civil and criminal penalties for Vybond and the individuals involved, including fines, debarment from export privileges, loss of business opportunities, and imprisonment. Violations may also lead to disciplinary action up to and including termination of employment or any applicable contract. Individuals are required to report any suspected or actual violation immediately.

Reporting & Accountability



- Concerns can be raised confidentially through the Paycom Hotline 24/7.
- Reports may also be directed to Managers, HR, or Legal & Compliance (legal@vybond.com).
- Retaliation for good faith reporting is strictly prohibited (see also Vybond’s Non-Retaliation Policy CORP-POL-00020).
- Throughout investigations, Vybond will maintain confidentiality, to the extent possible, based on its legal and ethical responsibilities.

Policy Owner/Contact

Vybond’s Chief Operating Officer is the owner of this Policy. The Director or Manager responsible for Human Resources is responsible for implementation, management, and documentation of this Policy. Please contact this individual if you have questions regarding this Policy, or to report a concern or violation of this Policy.

Disclaimer

This Policy will be interpreted consistent with all federal, state, and local laws. Vybond reserves the right to apply, interpret, and revise this policy as it deems appropriate. This Policy will be reviewed on an annual basis by HR, and Legal & Compliance or as otherwise determined by the HR and Legal & Compliance.

Version Control

Date	Version Number	Purpose/Change	Author/Approver
February 16, 2026	1.0	Original Version	Human Resources Director