



Code of Ethics and Business Conduct Policy

Policy Number: CORP-POL-01148/2

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”) serves 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.

Reporting & Non-Retaliation

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 to managers, Legal, HR, or the Paycom Ethics Helpline (anonymous, 24/7).
- ii) Reports should be made in good faith, meaning the individual has a reasonable belief that the information provided is accurate and reflects a potential violation of Company policy or applicable law.



- iii) Vybond prohibits retaliation for good-faith reports and participation in investigations per Vybond [Non-Retaliation Policy CORP-POL-00020](#).
- iv) All reports and investigations will be handled with appropriate confidentiality to the extent possible, consistent with Vybond's legal and ethical obligations.

Ethical Business Practices

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](#).

All reported concerns will be reviewed promptly and, where appropriate, investigated in a fair, timely, and impartial manner. Employees are expected to cooperate fully in any investigation. Corrective action will be taken where warranted, consistent with Company policy and applicable law.

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.



Gifts & Entertainment

Gift and entertainment provided to commercial parties must comply with Vybond's [Gifts & Entertainment Policy CORP-POL-00022](#). Gifts must be reasonable, business-related, and never provided during active bidding periods. Pre-approval is required where applicable, and all gifts must be logged in accordance with Vybond's [Records Retention and Destruction Policy CORP-POL-00023](#).

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.

Global Trade Compliance

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.



Confidentiality & Information Protection

Vybond Personnel are entrusted with confidential, proprietary, and sensitive information belonging to the Company, its employees, customers, suppliers, and business partners. Personnel must:

- i) Use such information only for legitimate business purposes.
- ii) Protect such information from unauthorized access, use, or disclosure,
- iii) Comply with all Company policies and contractual obligations relating to information protection. (See [Confidential Information Policy CORP-POL-00056](#)).

Confidential information includes, but is not limited to, trade secrets, technical data, product formulations, pricing, customer information, financial information, and business strategies.

Personnel must not:

- i) Disclose confidential information to unauthorized individuals;
- ii) Use confidential information for personal benefit or for the benefit of a third party; or
- iii) Access information without a legitimate business need.

Any suspected loss, misuse, or unauthorized disclosure must be reported within 24 hours, or as soon as practicable, to Legal & Compliance or through designated reporting channels.

These obligations continue after employment ends.

Data Privacy

Vybond complies with applicable data protection and privacy laws, including but not limited to GDPR, CCPA, and HIPAA. Personnel must:

- i) Collect, use, and process personal data only for legitimate business purposes;
- ii) Limit access to personal data to individuals with a business need to know;
- iii) Follow Company requirements for secure handling, storage, and transmission of data; and
- iv) Report any suspected data breach or privacy incident within 24 hours, or as soon as practicable.

Personal data must not be retained longer than necessary and must be handled in accordance with Vybond's [Records Retention and Destruction Policy CORP-POL-00023](#).

Financial Integrity & Reporting

- 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.

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.



Acceptable Use & Technology

Vybond provides technology resources for legitimate business use. Personnel must use Company systems, devices, and networks responsibly, securely, and in compliance with Company policies. (see Vybond's [Acceptable Use Policy CORP-POL-00030](#)). Personnel must not:

- i) Use Company systems, information, or property for unlawful, unethical, or unauthorized activities;
- ii) Circumvent security controls or access restrictions;
- iii) Install or use unauthorized software or applications; or
- iv) Engage in activities that compromise system security or integrity.

Personnel have no expectation of privacy when using Company systems. Vybond may monitor, access, and review activity on Company systems as permitted by law and Company policy.

All communications conducted using Company systems, including email, messaging platforms, and other electronic tools, are Company records and may be retained, monitored, or accessed in accordance with Company policy and applicable law.

Generative AI Use

Use of generative artificial intelligence tools for Company business must comply with Vybond's [Generative AI Use Policy CORP-POL-00057](#) and all applicable Company requirements regarding:

- i) Confidentiality & Information Protection
- ii) Data Privacy
- iii) Acceptable Use of Technology

Personnel must not input confidential, proprietary, personal, or regulated information into AI tools unless expressly authorized by Company policy and approved processes.

Intellectual Property

Vybond's intellectual property—including trade secrets, proprietary processes, designs, and technical information—is a critical business asset. Personnel must:

- i) Use intellectual property only for legitimate business purposes;
- ii) Protect it from unauthorized use, disclosure, or loss;
- iii) Comply with all Company requirements for storage, transfer, and protection of proprietary information.
- iv) Use Company trademarks, logos, and branding materials only as authorized and in accordance with Marketing-approved brand guidelines, including restrictions on external use.

All work product, inventions, or materials created in connection with employment are the property of Vybond to the extent permitted by law.

Personnel must also respect the intellectual property rights of third parties and comply with all licensing and contractual restrictions.



Labor, Human Rights, and Fair Treatment

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.

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.

- i) 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.
- ii) 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.
- iii) 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](#)).

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-0042](#). 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 strictly prohibits retaliation against any individual who, in good faith, reports a concern or participates in an investigation. For additional details on reporting channels and non-retaliation protections, see the “Reporting & Non-Retaliation” section of this Policy.

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 raises a concern or participates in an investigation, as detailed in the “Reporting & Non-Retaliation” section of this Policy

Freedom of Association

Vybond respects the legal rights of employees to freely choose whether to organize, join, or refrain from joining a union, in accordance with applicable laws.

Ethical Conduct & Workplace Safety Standards

Workplace Violence & 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 are examples of behaviors that are strictly prohibited and may result in disciplinary action up to and including termination – this list is non-exhaustive:



- (a) Provoking, encouraging, or coercing any other person to engage in physical violence.
- (b) Committing or attempting physical harm to any other person.
- (c) 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.
- (d) 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.

Drug & 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. Tobacco products, including e-cigarettes/vaping, are prohibited throughout Company workplaces and vehicles, consistent with state/local ordinances.

Personnel must:

- i) Report to work fit for duty and free from impairment caused by drugs or alcohol.
- ii) 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.
- iii) Inform HR if they are taking a lawfully prescribed medication that may impair their ability to perform essential job functions safely.

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.

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 evaluation, testing coordination, transportation, and confidentiality based on reasonable suspicion 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.

Examples of violations include, but are not limited to:

- i) Using, possessing, selling, distributing, or being under the influence of illegal drugs or unauthorized controlled substances while on Vybond premises or conducting Vybond business.



- ii) Consuming alcohol during work hours or on Vybond property unless expressly authorized by leadership for approved functions.
- iii) Reporting to work impaired or unfit for duty.
- iv) Refusing to submit to required drug/alcohol testing when permitted under law and Vybond policy, consistent with published procedures.

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.

Environmental & Product Stewardship

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:

- i) Comply with all applicable environmental laws, regulations, permits, and Vybond requirements.
- ii) Consider environmental impacts when making decisions and conduct operations in a way that prevents pollution and protects air, water, land, and natural resources.
- iii) Use energy, water, and materials efficiently and seek opportunities to reduce waste and emissions.
- iv) Handle, store, and dispose of hazardous and non-hazardous waste safely and responsibly and in accordance with all laws applicable to hazardous substances.
- v) Take precautions to prevent spills, releases, or other environmental harm, and avoid exposing Personnel, contractors, or the public to hazardous substances.
- vi) 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](#)).

Product Stewardship, Quality & Continuous Improvement

- i) **Stewardship:** Vybond is committed to responsible product stewardship throughout the entire product lifecycle, including product design, raw material selection, manufacturing, marketing, distribution, use, and end-of-life considerations. Personnel must act in a manner that prioritizes product safety, regulatory compliance, environmental responsibility, and customer trust, and must promptly report any product safety, chemical compliance, or environmental concerns so that appropriate corrective actions may be taken (see Vybond's [Product Stewardship Policy CORP-POL-00054](#)).
- ii) **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 (see Vybond's Quality [Vision](#), [Policy](#), and [Absolutes](#)).
- iii) **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.

For additional detail on reporting expectations and non-retaliation protections, refer to the "Reporting & Non-Retaliation" section above.

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	Purpose/Change	Author/Approver
February 1, 2026	1.0	Original Version	Human Resources Director
June 15, 2026	2.0	Reorganized structure; strengthened reporting, compliance, and information governance; added AI/technology, FoA, and Product Stewardship provisions; removed prescriptive thresholds; and streamlined duplicative content.	Human Resources Director; Sr Legal & Compliance Manager