

**NEXTERS INC.**  
**CODE OF BUSINESS CONDUCT AND ETHICS**

**I. INTRODUCTION**

A. Purpose

This Code of Business Conduct and Ethics (the “*Code*”) contains general guidelines for conducting the business of Nexters Inc., together with its direct and indirect subsidiaries (the “*Company*” or “*we*”) consistent with the highest standards of business ethics. To the extent this Code requires a higher standard than required by commercial practice or applicable laws, rules or regulations, the Company adheres to these higher standards. In accordance with the requirements of the Securities and Exchange Commission (the “*SEC*”) and the rules of the Nasdaq Stock Market LLC (“*Nasdaq*”), the Board of Directors of the Company (the “*Board*”) has adopted this Code to encourage:

- honest and ethical conduct, including fair dealing and the ethical handling of actual or apparent conflicts of interest;
- full, fair, accurate, timely and understandable disclosure;
- compliance with applicable governmental laws, rules and regulations;
- prompt internal reporting of any violations of law or the Code;
- accountability for adherence to the Code, including fair process by which to determine violations;
- consistent enforcement of the Code, including clear and objective standards for compliance;
- protection for persons reporting any such questionable behavior;
- the protection of the Company’s legitimate business interests, including its assets and corporate opportunities; and
- confidentiality of information entrusted to directors, officers and employees by the Company and its customers.

This Code applies to all directors, officers and employees (including sub-contractors, consultants, vendors and suppliers) of the Company and its direct and indirect subsidiaries. We refer to all officers and other employees covered by this Code as “Company employees” or simply “employees,” unless the context otherwise requires. In this Code, we refer to our principal executive officer, principal financial officer, principal accounting officer and controller, or persons performing similar functions, as our “principal financial officers”.

B. Seeking Help and Information

This Code is not intended to be a comprehensive rulebook and does not address every situation that you may face. If you feel uncomfortable about a situation or have any doubts about whether it is consistent with the Company’s ethical standards, seek help. We encourage you to contact your manager for help first. If your manager cannot answer your question or if you do not feel comfortable contacting your manager, the Company has established two alternative options:

- *Email:* non-anonymous requests for information may be sent through email ethics@nexters.com. The email will be monitored by the Company's Chief Executive Officer, Chief Financial Officer, General Counsel, Head of Internal Controls and Members of the Audit Committee.
- *Online portal:* anonymous requests for information may be submitted through an online portal at <https://www.whistleblowerservices.com/nexters>. The requests will be sent to: the Chief Executive Officer, Chief Financial Officer, General Counsel, Head of Internal Controls or Members of the Audit Committee. You may remain anonymous and will not be required to reveal your identity in a report made on the Company's website, although providing your identity may assist the Company in addressing your questions or concerns.

#### C. Reporting Violations of the Code

All employees and directors have a duty to report any known or suspected violation of this Code, including violations of the laws, rules, regulations or policies that apply to the Company. If you know of or suspect a violation of this Code, immediately report the conduct to your manager or the Company's General Counsel. The Company's General Counsel will work with you and your manager or other appropriate persons to investigate your concern. If you do not feel comfortable reporting the conduct to your manager or you do not get a satisfactory response, the Company has established two alternative options:

- *Email:* non-anonymous reports may be sent through email ethics@nexters.com. The email will be monitored by the Company's Chief Executive Officer, Chief Financial Officer, General Counsel, Head of Internal Controls and Members of the Audit Committee.
- *Online portal:* anonymous reports may be submitted through an online portal at <https://www.whistleblowerservices.com/nexters>. The request will be sent to: the Chief Executive Officer, Chief Financial Officer, General Counsel, Head of Internal Controls or Members of the Audit Committee. You may remain anonymous and will not be required to reveal your identity in a report made on the Company's website, although providing your identity may assist the Company in investigating your concern. Your manager, the Company's General Counsel and the Company will protect your confidentiality to the extent possible, consistent with applicable laws and the Company's need to investigate your concern.

It is Company policy that any employee or director who violates this Code will be subject to appropriate discipline, which may include, for an employee, termination of employment or, for a director, a request that such director resign from the Board. This determination will be based upon the facts and circumstances of each particular situation. If you are accused of violating this Code, you will be given an opportunity to present your version of the events at issue prior to any determination of appropriate discipline. Employees and directors who violate the law or this Code may expose themselves to substantial civil damages, criminal fines and prison terms. The Company may also face substantial fines and penalties and may incur damage to its reputation and standing in the community. Your conduct as a representative of the Company, if it does not comply with the law or with this Code, can result in serious consequences for both you and the Company.

#### D. Policy Against Retaliation

The Company prohibits retaliation against an employee or director who, in good faith, seeks help or reports known or suspected violations. Any reprisal or retaliation against an employee or director because the employee or director, in good faith, sought help or filed a report will be subject to disciplinary action, including potential termination of employment. All persons who are interviewed, asked to provide information or otherwise participate in an investigation have a duty

to fully cooperate with the investigators. Requests for confidentiality by participants will be honored to the extent possible within the legitimate needs of law and the investigation.

E. Waivers of the Code

Any waiver of this Code for our directors, executive officers or other principal financial officers may be made only by our Board and will be disclosed to the public as required by law or the Nasdaq rules, when applicable. Waivers of this Code for other employees may be made only by our Chief Executive Officer or General Counsel and will be reported to our Audit Committee.

## II. CONFLICTS OF INTEREST

A. Identifying Potential Conflicts of Interest

Employees, officers and directors must act in the best interests of the Company. You must refrain from engaging in any activity or having a personal interest that presents a “conflict of interest” and should seek to avoid even the appearance of a conflict of interest. A conflict of interest occurs when your personal interest interferes with the interests of the Company. A conflict of interest can arise whenever you, as an employee, officer or director, take action or have an interest that prevents you from performing your Company duties and responsibilities honestly, objectively and effectively.

Identifying potential conflicts of interest may not always be clear-cut. The following situations might reasonably be expected to give rise to a conflict of interest and should be identified to, and addressed by, the Company’s General Counsel or the Board:

- Outside Employment. An employee being employed by, serving as a director of, or providing any services to a company that the individual knows or suspects is a material customer, supplier or competitor of the Company (other than services to be provided as part of an employee’s job responsibilities for the Company).
- Improper Personal Benefits. An employee or director obtaining any material (as to them) personal benefits or favors because of their position with the Company. Please see “Gifts and Entertainment” below for additional guidelines in this area.
- Financial Interests. An employee having a “material interest” (ownership or otherwise) in any company that the individual knows or suspects is a material customer, supplier or competitor of the Company and using their position to influence a transaction with such company. Whether an employee has a “material interest” will be determined by the Company’s General Counsel or Board, as applicable, in light of all of the circumstances, including consideration of the relationship of the employee to the customer, supplier or competitor, the relationship of the employee to the specific transaction and the importance of the interest to the employee having the interest. If you are uncertain whether a particular company is a material customer, supplier or competitor of the Company, please contact the Company’s General Counsel for assistance.
- Loans or Other Financial Transactions. An employee or director obtaining loans or guarantees of personal obligations from, or entering into any other personal financial transaction with, any company that the individual knows or suspects is a material customer, supplier or competitor of the Company. This guideline does not prohibit arms-length transactions with banks, brokerage firms or other financial institutions.
- Service on Boards and Committees. An employee or director serving on a board of directors or trustees or on a committee of any entity (whether profit or not-for-profit) whose interests reasonably would be expected to conflict with those of the Company.

- Actions of Family Members. The actions of family members outside the workplace may also give rise to the conflicts of interest described above because they may influence an employee's or director's objectivity in making decisions on behalf of the Company. For purposes of this Code, "family members" include your spouse or life-partner, brothers, sisters, parents, in-laws and children whether such relationships are by blood or adoption.

For purposes of these Guidelines, a company is a "material" customer if the customer has made payments to the Company in the past year in excess of US\$200,000 or 5% of the customer's gross revenues, whichever is greater. A company is a "material" supplier if the supplier has received payments from the Company in the past year in excess of US\$200,000 or 5% of the supplier's gross revenues, whichever is greater. If you are uncertain whether a particular company is a material customer or supplier, please contact the Company's General Counsel for assistance.

#### B. Disclosure of Conflicts of Interest

The Company requires that employees and directors disclose any situation that reasonably would be expected to give rise to a conflict of interest. If you suspect that you have a situation that could give rise to a conflict of interest, or something that others could reasonably perceive as a conflict of interest, you must report it in writing to your manager or the Company's General Counsel, or if you are a director or executive officer, to the Board. The Company's General Counsel or the Board, as applicable, will work with you to determine whether you have a conflict of interest and, if so, how best to address it. All transactions that could potentially give rise to a conflict of interest involving a director, executive officer or principal financial officer must be approved by the Board, and any such approval will not be considered a waiver of this Code.

### III. CORPORATE OPPORTUNITIES

As an employee or director of the Company, you have an obligation to advance the Company's interests when the opportunity to do so arises. If you discover or are presented with a business opportunity through the use of corporate property or information or because of your position with the Company, you should first present the business opportunity to the Company before pursuing the opportunity in your individual capacity. No employee or director may use corporate property, information or their position with the Company for personal or another's gain (or to the detriment of the Company) while employed by us or, for a director, while serving on our Board.

You should disclose to your manager the terms and conditions of each business opportunity covered by this Code that you wish to pursue. Your manager will contact the Company's General Counsel and the appropriate management personnel to determine whether the Company wishes to pursue the business opportunity. If the Company waives its right to pursue the business opportunity, you may pursue the business opportunity on the same terms and conditions as originally proposed and consistent with the other ethical guidelines set forth in this Code.

### IV. CONFIDENTIAL INFORMATION

Employees and directors have access to a variety of confidential information regarding the Company. Confidential information includes all non-public information that might be of use to competitors, or, if disclosed, harmful to the Company or its vendors, customers or suppliers. Employees and directors have a duty to safeguard all confidential information of the Company or third parties with which the Company conducts business, except when disclosure is authorized or legally mandated. Unauthorized disclosure of any confidential information is prohibited. Additionally, employees and directors should take appropriate precautions to ensure that confidential or sensitive business information, whether it is proprietary to the Company or another company, is not communicated within the Company except to employees and directors who have

a need to know such information to perform their responsibilities for the Company. An employee's and director's obligation to protect confidential information continues after they leave the Company. Unauthorized disclosure of confidential information could cause competitive harm to the Company or its vendors, customers or suppliers and could result in legal liability to you and the Company.

"Confidential Information" includes (whether or not reduced to writing): our trade secrets, inventions, computer programs and related data and materials, drawings, file data, documentation, diagrams, specifications, know-how, processes, formulas, models, flow charts, software completed or in various stages of development, source codes, object codes, research and development procedures, test results, marketing techniques, materials and development plans, training methods and material, price lists, pricing policies, business plans, client lists, vendor lists, client agreements, vendor agreements, employee list, financial information and projections and employee files and other information related to computer programs, hypertext, and expert systems activities. Third parties may also furnish information to us concerning their respective business affairs, finances, properties, and methods of operation or other data which are not in the public domain and which are proprietary or confidential.

An employee shall never accept information offered by a third party that is represented as confidential, or which appears from the context or circumstances to be confidential, unless an appropriate nondisclosure/confidentiality agreement has been signed with the party offering the information. The Company's General Counsel can provide nondisclosure agreements to fit any particular situation. Employees must ensure that they disclose confidential information only to those persons who are authorized to receive such information and only on a need-to-know basis. Employees shall ensure necessary pre-authorization(s), wherever applicable, and/or confidentiality agreements are in place prior to sharing or disclosing any confidential information with a third party.

Employees who have access to proprietary and confidential information must take every precaution to keep it confidential. Every employee shall protect the reputation of the Company, its employees and its services and products at all times.

Any questions or concerns regarding whether disclosure of Company information is legally mandated should be promptly referred to the Company's General Counsel.

## **V. COMPUTER AND COMMUNICATION RESOURCES**

The Company's computer and communication resources, including computers, smartphones, voicemail, chat and e-mail, provide substantial benefits, but they also present significant security and liability risks to employees and the Company. It is extremely important that employees take all necessary measures to secure their computers and all electronic devices with passwords and other relevant measures. This applies also to situations where an employee uses their own devices to access or store the Company information. All sensitive, confidential or restricted electronic information must be password protected.

All of the computing resources used to provide computing and network connections throughout the organization are the property of the Company and are intended for use by employees to conduct the Company's business. Incidental and occasional personal use of e-mail and telephones is permitted. Private messages may not be sent with illegal, unauthorized or unethical intentions, nor may this kind of messages include any illegal content or breach third-party rights. It is recommended that private messages are saved in a separate folder, which is recognizable by its title as consisting of private messages. This applies to both incoming and outgoing messages.

## **VI. COMPETITION AND FAIR DEALING**

All employees should endeavor to deal fairly with fellow employees and with the Company's vendors, licensors, customers, suppliers and competitors. Employees should not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair-dealing practice. Employees should maintain and protect any intellectual property licensed from licensors with the same care as they employ with regard to Company-developed intellectual property.

## **VII. GIFTS AND ENTERTAINMENT**

The following information is subject to and must be considered only in conjunction with the strict limitations set forth elsewhere in this Code, in particular Section X.G. The giving and receiving of gifts is a common business practice. Appropriate business gifts and entertainment are welcome courtesies designed to build relationships and understanding among business partners. Gifts and entertainment, however, should not compromise, or appear to compromise, your ability to make objective and fair business decisions. In addition, it is important to note that the giving and receiving of gifts are subject to a variety of laws, rules and regulations applicable to the Company's operations. These include, without limitation, laws covering the marketing of products, bribery and kickbacks. You are expected to understand and comply with all laws, rules and regulations that apply to your job position. For additional information regarding the Company's policies related to gifts and entertainment, please see the Company's Anti-Corruption Compliance Policy.

Note: Gifts and entertainment may not be offered or exchanged under any circumstances to or with any governmental employees or representatives, or politicians or political parties, without the prior approval of management. If you have any questions about this policy, contact your supervisor or the Company's General Counsel for additional guidance. For a more detailed discussion of special considerations applicable to dealing with governments, see "Interactions with Governments."

## **VIII. COMPANY RECORDS**

Accurate and reliable records are crucial to our business. Our records are the basis of our earnings statements, financial reports, regulatory submissions and many other aspects of our business and guide our business decision-making and strategic planning. Company records include financial records, personnel records, records relating to our technology and product development, promotion and regulatory submissions and all other records maintained in the ordinary course of our business.

All Company records must be complete, accurate and reliable in all material respects. Each employee and director must follow any formal document retention policy of the Company with respect to Company records within such employee's or director's control.

## **IX. PROTECTION AND USE OF COMPANY ASSETS**

Employees should protect the Company's assets and ensure their efficient use for legitimate business purposes only and not for any personal benefit or the personal benefit of anyone else. Theft, carelessness and waste have a direct impact on the Company's financial performance. The use of Company funds or assets, whether or not for personal gain, for any unlawful or improper purpose is prohibited.

Employees should be aware that Company property includes all data and communications transmitted or received to or by, or contained in, the Company's electronic or telephonic systems. Company property also includes all written communications. Employees and other users of this property should have no expectation of privacy with respect to these communications and data. To

the extent permitted by law, the Company has the ability, and reserves the right, to monitor all electronic and telephonic communication. These communications may also be subject to disclosure to law enforcement or government officials.

## **X. ACCURACY OF FINANCIAL REPORTS AND OTHER PUBLIC COMMUNICATIONS**

As a public company we are subject to various securities laws, regulations and reporting obligations. Applicable law, regulation and stock exchange rules and our policies require the disclosure of accurate and complete information regarding the Company's business, financial condition and results of operations. Inaccurate, incomplete or untimely reporting will not be tolerated and can severely damage the Company and result in legal liability.

The Company's principal financial officers and other employees working in the finance department have a special responsibility to ensure that all of our financial disclosures are full, fair, accurate, timely and understandable. These employees must understand and strictly comply with generally accepted accounting principles and all standards, laws and regulations for accounting and financial reporting of transactions, estimates and forecasts.

## **XI. COMPLIANCE WITH LAWS AND REGULATIONS**

Each employee and director has an obligation to comply with all laws, rules and regulations applicable to the Company's operations. These include, without limitation, laws covering bribery, kickbacks and other improper payments, the development, testing, production, marketing and sale of our products, copyrights, trademarks and trade secrets, information privacy, insider trading, illegal political contributions, competition and antitrust prohibitions, foreign corrupt practices, offering or receiving gratuities, environmental hazards, employment discrimination or harassment, occupational health and safety, false or misleading financial information or misuse of corporate assets. You are expected to understand and comply with all laws, rules and regulations that apply to your job position. If any doubt exists about whether a course of action is lawful, you should seek advice from your manager or the Company's General Counsel.

### **A. Interactions with the Government**

The Company may conduct business with the U.S. governments, EU institutions and other bodies, state and local governments and the governments of other countries. The Company is committed to conducting its business with all governments and their representatives with the highest standards of business ethics and in compliance with all applicable laws and regulations, including the special requirements that apply to communications with governmental bodies that may have regulatory authority over our products and operations, such as government contracts and government transactions.

If your job responsibilities include interacting with the government, you are expected to understand and comply with the special laws, rules and regulations that apply to your job position as well as with any applicable standard operating procedures that the Company has implemented. If any doubt exists about whether a course of action is lawful, you should seek advice immediately from your manager and the Company's General Counsel.

In addition to the above, you must obtain approval from the Company's Chief Executive Officer or General Counsel for any work activity that requires communication with any member or employee of a legislative body or with any government official or employee. Work activities covered by this policy include meetings with legislators or members of their staffs or with senior executive branch officials on behalf of the Company. Preparation, research and other background activities that are done in support of lobbying communication are also covered by this policy even if the communication ultimately is not made. If any doubt exists about whether a given work

activity would be considered covered by this provision, you should seek advice immediately from your manager and the Company's General Counsel.

For additional information regarding the Company's policies on interactions with governments, please see the Company's Anti-Corruption Compliance Policy.

#### B. Political Contributions and Volunteer Activities

The Company encourages its employees and directors to participate in the political process as individuals and on their own time. However, applicable laws severely limit the contributions the Company can make to political parties or candidates. It is Company policy that Company funds or assets not be used to make a political contribution to any political party or candidate, unless prior approval has been given by our Chief Executive Officer or General Counsel. The Company will not reimburse you for personal political contributions. When you participate in non-Company political affairs, you should be careful to make it clear that your views and actions are your own, and not made on behalf of the Company. Please contact the Company's General Counsel if you have any questions about this policy.

#### C. Compliance with Antitrust Laws

Antitrust laws are designed to protect consumers and competitors against unfair business practices and to promote and preserve competition. Our policy is to compete vigorously and ethically while complying with all antitrust, monopoly, competition or cartel laws in all countries, states or localities in which the Company conducts business. Violations of antitrust laws may result in severe penalties against the Company and its employees, including potentially substantial fines and criminal sanctions. You are expected to maintain basic familiarity with the antitrust principles applicable to your activities, and you should consult the Company's General Counsel with any questions you may have concerning compliance with these laws.

##### 1. Meetings with Competitors

Employees should exercise caution in meetings with competitors. Any meeting with a competitor may give rise to the appearance of impropriety. You should try to meet with competitors in a closely monitored, controlled environment for a limited period of time.

##### 2. Professional Organizations and Trade Associations

Employees should be cautious when attending meetings of professional organizations and trade associations at which competitors are present. Attending meetings of professional organizations and trade associations is both legal and proper, if such meetings have a legitimate business purpose and are conducted in an open fashion, adhering to a proper agenda. At such meetings, you should not discuss any terms that may harm the Company's competitive position or any other proprietary, competitively sensitive information.

#### D. Compliance with Insider Trading Laws

Consistent with the Company's Insider Trading Compliance Policy and all insider trading laws applicable to the Company and its securities, the Company's employees and directors are prohibited from trading in the stock or other securities of the Company while in possession of material nonpublic information or inside information about the Company. In addition, Company employees and directors are prohibited from recommending, inducing, "tipping" or suggesting that anyone else buy or sell the Company's stock or other securities on the basis of material non-public information or inside information. Employees and directors who obtain material non-public information or inside information about another company in the course of their duties are prohibited from trading in the stock or securities of the other company while in possession of such information or "tipping" others to trade on the basis of such information. Violation of insider trading and market abuse laws and regulations can result in severe fines and criminal penalties, as well as disciplinary

action by the Company, up to and including, for an employee, termination of employment or, for a director, a request that such director resign from the Board. You are required to read carefully and observe our Insider Trading Compliance Policy, as amended from time to time. Please contact the Company's General Counsel or Chief Financial Officer for a copy of the Insider Trading Compliance Policy or with any questions you may have about insider trading laws.

E. Personal Communications

Employees should take care when presenting themselves in public settings, as well as online and in web-based forums or networking sites. Employees are encouraged to conduct themselves in a responsible, respectful, and honest manner at all times. The Company understands that employees may wish to create and maintain a personal presence online using various forms of social media. However, in so doing employees should include a disclaimer that the views expressed therein do not necessarily reflect the views of the Company. Employees should be aware that that even after a posting is deleted, certain technology may still make that content available to readers.

Employees are prohibited from using or disclosing confidential, proprietary, sensitive or trade secret information of the Company, its partners, vendors, consultants or other third parties with which the Company does business. Employees may not provide any content to Company social media sites that may be construed as political lobbying or solicitation of contributions, or use the sites to link to any sites sponsored by or endorsing political candidates or parties, or to discuss political campaigns, political issues or positions on any legislation or law.

F. Public Communications

The Company places a high value on its credibility and reputation in the community. What is written or said about the Company in the news media and investment community directly impacts our reputation, positively or negatively. Our policy is to provide timely, accurate and complete information in response to public requests (from media, analysts, etc.), consistent with our obligations to maintain the confidentiality of competitive and proprietary information and to prevent selective disclosure of market-sensitive financial data.

The Company has designated certain individuals as "spokespersons" who are responsible for communicating with analysts, institutional investors and representatives of the media. Any employee or director who is not a designated spokesperson of the Company is prohibited from communicating any information about the Company to analysts, institutional investors, other stockholders or representatives of the media, except at the request of the Company's designated spokespersons.

Please contact the Company's General Counsel or Chief Financial Officer with any questions you may have about disclosure matters.

G. Anti-Corruption Compliance and The U.S. Foreign Corrupt Practices Act

The Company is committed to complying with all applicable anti-corruption laws, including the U.S. Foreign Corrupt Practices Act in the United States, the UK Bribery Act 2010 in the United Kingdom and other applicable anti-corruption laws. For additional information regarding our anti-corruption policies and procedures, please see the Company's Anti-Corruption Compliance Policy.

The Company prohibits bribery in any form. Employees may not, whether directly or through a third party, offer, give, promise or authorize the payment of anything of value to any person or entity, including any government official, in order to improperly influence or reward any decision or act related to the Company's business, including to improperly obtain or retain business or a business advantage (such as confidential pricing information, a reduction in taxes or fines, or a required license or government authorization). Receiving, requesting, or agreeing to receive a bribe is also prohibited, as are facilitation payments (small, unofficial payments, often made to low-level

public officials, to expedite a routine governmental action, such as speeding up customs clearance, governmental permit processing and other non-discretionary acts). Similarly, Company employees may not provide gifts, travel expenses, entertainment, or other hospitality to improperly influence any business decision related to the Company. In the same way Company employees are prohibited from making corrupt or improper payments directly, third parties or intermediaries acting on behalf of the Company are also prohibited from doing the same. Please refer to the Company's Anti-Corruption Compliance Policy for more information.

## **XII. POLICY FOR COMPLAINTS REGARDING ACCOUNTING, INTERNAL ACCOUNTING CONTROLS OR AUDITING MATTERS**

The Company is committed to full and accurate financial disclosure and to maintaining its books and records in compliance with all applicable laws, rules and regulations. The Company wishes to encourage employees, independent contractors, third-party vendors, customers and business partners to make the Company aware of any practices, procedures or circumstances that raise concerns about the integrity of its financial disclosures, books and records. Please refer to the Company's Whistleblower Policy for more information.

## **XIII. ENVIRONMENT, HEALTH AND SAFETY**

The Company is committed to providing a safe and healthy working environment for its employees and to avoiding adverse impact and injury to the environment and the communities in which it does business. Company employees and directors must comply with all applicable environmental, health and safety laws, regulations and Company standards. It is your responsibility to understand and comply with the laws, regulations and policies that are relevant to your role. Failure to comply with environmental, health and safety laws and regulations can result in civil and criminal liability against you and the Company, as well as disciplinary action by the Company, up to and including termination of employment. You should contact the Company's General Counsel if you have any questions about the laws, regulations and policies that apply to you.

### **A. Environment**

All Company employees and directors should strive to conserve resources and reduce waste and emissions through recycling and other energy conservation measures. You have a responsibility to promptly report any known or suspected violations of environmental laws or any events that may result in a discharge or emission of hazardous materials.

### **B. Health and Safety**

The Company is committed not only to complying with all relevant health and safety laws, but also to conducting business in a manner that protects the safety of its employees. All employees and directors are required to comply with all applicable health and safety laws, regulations and policies relevant to their positions. If you have a concern about unsafe conditions or tasks that present a risk of injury to you, please report these concerns immediately to your manager or the Company's General Counsel.

### **C. Employment Practices**

The Company pursues fair employment practices in every aspect of its business. The following is only intended to be a summary of certain of our employment policies and procedures. Copies of the Company's detailed policies are available upon request. Company employees must comply with all applicable labor and employment laws, including anti-discrimination laws and laws related to freedom of association and privacy. It is your responsibility to understand and comply with the laws, regulations and policies that are relevant to your job. Failure to comply with labor and

employment laws can result in civil and criminal liability against you and the Company, as well as disciplinary action by the Company, up to and including termination of employment. You should contact the Company's General Counsel if you have any questions about the laws, regulations and policies that apply to you.

D. Harassment and Discrimination

The Company is committed to providing equal opportunity and fair treatment to all individuals on the basis of merit, without discrimination because of race, color, religion, national origin, sex (including pregnancy), sexual orientation, age, disability, veteran status or other characteristic protected by law. The Company also prohibits harassment based on these characteristics in any form, whether physical or verbal and whether committed by managers, non-supervisory personnel or non-employees. Harassment may include, but is not limited to, offensive sexual flirtations, unwanted sexual advances or propositions, verbal abuse, sexually or racially degrading words, or the display in the workplace of sexually suggestive or racially degrading objects or pictures.

If you have any complaints about discrimination or harassment, report such conduct to your manager. All complaints will be treated with sensitivity and discretion. Your manager and the Company will protect your confidentiality to the extent possible, consistent with law and the Company's need to investigate your concern. Where our investigation uncovers harassment or discrimination, we will take prompt corrective action, which may include disciplinary action by the Company, up to and including, termination of employment. The Company strictly prohibits retaliation against an employee who, in good faith, files a complaint.

Any member of management who has reason to believe that an employee has been the victim of harassment or discrimination or who receives a report of alleged harassment or discrimination is required to report it to the relevant human resources personnel immediately.

E. Alcohol and Drugs

The Company is committed to maintaining a drug-free work place. All Company employees must comply strictly with Company policies regarding the abuse of alcohol and the possession, sale and use of illegal substances. Drinking alcoholic beverages is prohibited while on duty or on the premises of the Company, except at specified Company-sanctioned events or as otherwise authorized by management. Possessing, using, selling or offering illegal drugs and other controlled substances is prohibited under all circumstances while on duty or on the premises of the Company. Likewise, you are prohibited from reporting for work, or driving a Company vehicle or any vehicle on Company business, while under the influence of alcohol or any illegal drug or controlled substance.

F. Violence Prevention and Weapons

The safety and security of Company employees is vitally important. The Company will not tolerate violence or threats of violence in, or related to, the workplace. If you experience, witness or otherwise become aware of a violent or potentially violent situation that occurs on the Company's property or affects the Company's business you must immediately report the situation to your manager or the Human Resources Department.

The Company does not permit any individual to have weapons of any kind on Company property or in vehicles, while on the job or off-site while on Company business. This is true even if you have obtained legal permits to carry weapons. The only exception to this policy applies to security personnel who are specifically authorized by Company management to carry weapons.

#### **XIV. ACKNOWLEDGEMENT**

Employees acknowledge their understanding and agreement to comply with the Code upon commencement of employment. Employees may also be asked to re-affirm their agreement to comply with the Code annually, and upon request to take training related to this Code.

#### **XV. CONCLUSION**

This Code contains general guidelines for conducting the business of the Company consistent with the highest standards of business ethics. If you have any questions about these guidelines, please contact your manager or the Company's General Counsel. The Company expects all of its employees and directors to adhere to these standards.

This Code, as applied to the Company's principal financial officers, shall be our "code of ethics" within the meaning of Section 406 of the Sarbanes-Oxley Act of 2002 and the rules promulgated thereunder.

This Code and the matters contained herein are neither a contract of employment nor a guarantee of continuing Company policy. This Code is a statement of certain fundamental principles, policies and procedures that govern the Company's employees in the conduct of the Company's business. It is not intended to and does not create any rights in any employee, customer, client, visitor, supplier, competitor, shareholder or any other person or entity. It is the Company's belief that the policy is robust and covers most conceivable situations.

The Company reserves the right to amend, supplement or discontinue this Code and the matters addressed herein, without prior notice, at any time.

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Effective Date: August 26, 2021