



Calvary Robotics
ADVANCING AUTOMATION

CODE OF ETHICS

Table of Contents

03	A Message from the CEO	14	Environmental, Health, and Safety Standards
04	Introduction	15	Data Privacy and Confidentiality
05	Employee and Contractor Responsibility	16	Proprietary Information
06	Prohibition on Corruption and Bribery	17	Workplace Integrity and Respect
07	Money Laundering	18	Drug-free Workplace
08	Interaction with Public Officials	19	Social Media
09	Receiving and Giving Gifts	20	Application and Enforcement
10	Political, Charitable Contributions and Sponsorship	21	Contact Information
11	Conflict of Interest		
12	Fair Competition and Trade Compliance		
13	Prohibition of Child Labor, Forced Labor, and Human Trafficking		

A Message from the CEO

Dear Colleagues, Contractors, and Partners,

At Calvary Robotics, ethical behavior and corporate responsibility are as essential to our success as innovation. **Integrity remains at the heart of all our actions and decisions.** Our reputation for excellence is built on a foundation of trust, ethical behavior, and we hold ourselves accountable to the highest standards of conduct in every interaction and decision.

This Code of Ethics underscores our unwavering commitment to conducting business responsibly. It outlines our policies and serves as a guide for maintaining the highest ethical standards in everything we do. Calvary Robotics maintains a **“zero tolerance” for corruption, bribery, and all forms of illegal activity.**

Each of us and each of our business partners is expected to understand and adhere to these principles. I encourage you to familiarize yourself with this document and use it as a resource in your work. If you have questions or face ethical challenges, do not hesitate to seek guidance. We are here to support one another in doing what is right.

Thank you for your dedication to fostering a culture of integrity and excellence at Calvary Robotics. Together, we will continue to build a company that we can all take pride in.

Sincerely,
Robert Lague

Introduction



The Company's reputation is built on the good judgment, ethical standards, and personal integrity of every individual and entity associated with our Companies. As the Company continues to grow, it is imperative that all employees, contractors, suppliers, and other entities doing business with the Company conduct their activities in an ethical, responsible, and legally compliant manner. This Code of Ethics establishes the **standards of conduct expected of all** parties engaged with the Company.

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Employee and Contractor Responsibility

All employees, contractors, and business partners are responsible for:

- Promptly reporting any suspected violations of this Code of Ethics.
- Ensuring compliance with all policies and legal requirements.

The Company **protects individuals from retaliation** who, in good faith, report unethical, illegal, or unprofessional conduct. An employee will not be discharged, demoted, suspended, threatened, harassed, or subjected to adverse treatment because of any good faith reporting.

Anyone should report such questions, concerns, or complaints via alert@calvaryrobotics.com

Prohibition on Corruption and Bribery

In compliance with the U.S. Foreign Corrupt Practices Act (FCPA) and Economic Co-operation and Development (OECD) Anti-Bribery Conventions, the Company prohibits all forms of bribery and corruption.

Specifically:

- No individual or entity may **offer, give, solicit, or receive any bribe** to secure an advantage or influence a decision. A bribe may include gifts of significant value, entertainment, hospitality and travel that go beyond business needs, loans, personal favors, payment for travel expenses when there is not a clear business purpose for doing so, political or charitable contributions, or payment or benefit provided to an individual's family member in an effort to influence the individual.
- Payments, gifts, or favors to government officials or business representatives must comply with applicable laws and must not create the appearance of impropriety.
- Accurate records of all transactions must be maintained to reflect their true nature and purpose.

Violations of this policy may result in immediate termination of engagement and legal consequences.

The Company has a **ZERO-TOLERANCE POLICY TO BRIBERY AND CORRUPTION.**

Money Laundering

We conduct business only with **reputable customers** engaged in legitimate activities and using **legitimate funds**. Engaging with proceeds from criminal activity, including money laundering, can harm our integrity and reputation. Many laws prohibit handling such proceeds.

Interaction with Public Officials

Anti-bribery laws like the FCPA prohibit giving anything of value to public officials to gain business or improper advantages. **Facilitation payments** for routine actions are narrowly defined and uncommon in modern countries. If required, employees must get prior approval from their supervisor and the legal department, ensure the payment is justified, and obtain a detailed **receipt documenting** the purpose.

Receiving and Giving Gifts



Exchanging gifts and hospitality can nurture relationships, celebrate business successes, and strengthen business partnerships, but it can also **potentially influence decision-making** or give the appearance of impropriety.

Substantial gifts, favors, or excessive business entertainment from customers or suppliers are prohibited if they might influence business relationships. Generally, **gifts exceeding \$100.00 in value must be reported** to management before acceptance or upon receipt.

Political, Charitable Contributions and Sponsorship

All such contributions and sponsorships are subject to the prior approval of the Company CEO, HR and legal departments.

Conflict of Interest

7

All individuals and entities engaged with the Company must avoid activities or business ventures that could conflict with the interests of the Company. Specifically:

- Employees are expected to act in the best interest of the Company.
- No action should be taken that could be construed as **personal gain** or that undermines the interests of the Company.
- Secondary employment or business engagements with competitors, customers, or suppliers that create an actual or perceived conflict of interest are prohibited.
- **Personal relationships** between employees, or between employees and individuals associated with competing businesses, customers, or suppliers, must be disclosed if they have the potential to create actual or perceived conflicts of interest.

If further clarity is needed, consult your supervisor or the legal department of the Company.

Fair Competition and Trade Compliance

The Company supports open and fair competition and adheres to all applicable **antitrust and trade compliance laws**. Individuals and entities must:

- Avoid practices such as price-fixing, market allocation, or bid-rigging.
- Ensure that imports, exports, and other trade activities comply with applicable regulations.
- Refrain from engaging in unfair competitive practices or providing false or misleading information to customers or other business partners.
- Not enter into any agreements or voluntarily provide information that could be construed as furthering boycotts that are restricting international trade practices or are illegal.

Prohibition of Child Labor, Forced Labor and Human Trafficking

The Company strictly prohibits child labor, forced labor, and human trafficking in all forms. All individuals and entities doing business with the Company must adhere to the following standards:

- Employ only individuals who meet the minimum legal working age in the applicable jurisdiction.
- Prohibit all forms of forced labor, including involuntary servitude, debt bondage, and slavery.
- Actively monitor and ensure compliance with anti-trafficking laws and regulations within their operations and supply chains.

Any violations of this policy must be reported immediately and will be addressed with the utmost seriousness, including termination of engagement and potential legal action.



Environmental, Health, and Safety Standards

The Company is committed to protecting the health and safety of its employees, contractors, and communities. All parties are expected to:

- Comply with applicable environmental, health, and safety laws and regulations.
- Strive to reduce waste, conserve resources, and minimize environmental impacts.
- Report any safety hazards or violations promptly.

Data Privacy and Confidentiality

The Company is committed to protecting the personal data of employees, customers, and business partners.

All parties must:

- Handle data responsibly and in compliance with data protection laws.
- Protect confidential and proprietary information from unauthorized disclosure.

Proprietary Information

While associated with the Company, individuals and entities may access proprietary or confidential information, whether or not it is marked or otherwise designated as confidential. **All parties are responsible for safeguarding such information.** Proprietary information includes, but is not limited to, business plans, financial data, trade secrets, and customer or supplier information. Unauthorized use or disclosure is strictly prohibited. Information must only be based on a need-to-know basis even within the Company.

Upon termination or completion of engagement with the Company, all property and documents containing proprietary information must be returned. Retention of duplicates is prohibited.

Workplace Integrity and Respect



The Company fosters a **respectful, safe, and inclusive** workplace. The Company does not tolerate discrimination against groups or individuals based on race, color, national origin, religion, citizenship status, age, gender identity, sexual orientation, marital status, veteran status, genetic information, or other protected characteristics.

Discrimination, harassment, and violence are strictly prohibited. All levels of management should demonstrate honesty, ethical strength and fairness. Employees, contractors, and partners must:

- Treat others with respect and **dignity**.
- **Report** incidents of harassment, discrimination, or workplace violence promptly.
- Comply with the Company' policies regarding **diversity, equity, and inclusion**.

Drug-free Workplace

Employees must never be under the influence of drugs or alcohol that might impair their ability to do their job and/or put other employees at risk. The Company prohibits the **inappropriate use** of alcohol and legal drugs and the use, possession or sale of illegal drugs on Company property or whenever we are at work or representing the Company.

Social Media

When engaging on social media, employees, contractors, and partners must:

- Protect confidential and proprietary information.
- Avoid statements that could harm the **Company's reputation**.
- Clarify that personal views are not those of the Company unless explicitly authorized.

Application and Enforcement

This Code of Ethics applies to all employees, contractors, suppliers, and entities doing business with the Company. Violations of this policy may result in **disciplinary action**, termination of business relationships, and, if applicable, legal proceedings.

For questions or further guidance regarding this policy, contact your supervisor, the Legal department, Human Resources, or a senior leadership representative.

Contact Information

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