



# **Code of Business Conduct and Ethics**

**CONFIDENTIAL INFORMATION**

---

The content of this document is confidential. Consequently, this information shall not be disclosed under any circumstances, nor used for other purposes other than those for which the document was created without prior authorization from Origen Technologies.



# Code of Business Conduct and Ethics

Open is one of Origen Technologies' core values. It means that we are transparent and forthright in all our interactions. We have a culture of integrity and expect every member of Origen Technologies to act ethically and honestly. This includes all our employees, directors, officers, agents, partners, representatives, contractors, and consultants. To maintain our culture, we must always seek to do the right thing — comply with the law, act honorably and transparently, and treat all with dignity and respect.

The Origen Technologies Code of Business Conduct and Ethics (the "Code") is one of the ways we put our core values into practice. The Code is built around the recognition that everything we do is measured against robust standards of ethical business conduct. The bar is intentionally set high — a large part of Origen Technologies' success stems from doing business honestly and ethically. This commitment helps Origen Technologies attract and retain loyal customers, hire top-notch talent, develop innovative products, and provide great service. Trust and mutual respect among employees, contractors, and consultants, and with our customers and partners, are the foundation of our business. They are something each of us earns every day.

As we live our core values — innovative, passionate, disruptive, open, and fun — we must embody the Code as we pursue our mission "to make machine data accessible, usable and valuable to everyone." Please read our Code and embrace both its letter and spirit. Each of us has a personal responsibility to follow the principles of the Code in all matters relating to or impacting Origen Technologies. Our future depends on each of us holding each other and our partners, suppliers, contractors, and consultants to the high standards described in the Code.

If you have any questions or a situation does not seem right, we expect you to speak up. You can do so without any fear of retaliation. You have many resources available to help you, including your manager, the Executive Staff, Human Resources, and our Legal team.

## OUR VALUES

Integrity, honesty, and accountability are key to our success and form the basis of how we operate. Our values — Innovative, Passionate, Disruptive, Open and Fun — establish the foundation for our success by fostering a diverse culture that embraces the talents and achievements of all individuals while encouraging big thinking and a growth mindset to solve increasingly complex problems. You are the key to Origen Technologies' success, and we count on you to instill our values in all the work you do, and in all the interactions you have with customers, partners, each other, and others with whom you interact on Origen Technologies' behalf. At the end of the day, it is not just what we do at Origen Technologies, it is how we do it.

## WHO MUST FOLLOW OUR CODE?

All employees, officers and board members are required to read, understand, and follow the Code and to raise any concerns or potential violations of the Code. Failure to do so may result in disciplinary action up to and including termination of your relationship with Origen Technologies, in accordance with applicable local law. We also expect Origen Technologies partners, contractors, consultants, and others who may perform work or services for Origen Technologies to follow the Code to the full extent that it applies to their work with and on behalf of Origen Technologies. If you are concerned about something, we expect you to speak up.





## ROLE OF MANAGERS

Managers play a pivotal role in supporting our Code and our values. As company leaders, managers are responsible for setting the tone for their teams and are expected to hold themselves to the highest ethical and professional standards. Managers must ensure that each person on their team understands and complies with the Code and Origen Technologies' corporate policies and guidelines. Managers at all levels lead by example and play a vital role in answering questions and resolving and escalating matters appropriately. In addition, certain policies and guidelines require managers to proactively review and approve employee activities.

### *Managers: How to Respond to Questions and Concerns*

*If approached with a question or concern regarding the Code or any other policy, listen carefully and make sure you understand the concern that is being raised. Ask clarifying questions for additional information. Answer any questions that you can, but do not feel that you must give an immediate response. Seek help if you need it. If an employee raises a concern that may require investigation under the Code, immediately contact*

## THE CODE AND THE LAW

As we pursue our mission of making machine data accessible, usable, and valuable to everyone around the world, we are subject to many different laws internationally, including those relating to employment, governance, compliance, and data privacy and security laws. We each have a responsibility to be aware of and compliant with the laws that apply to Origen Technologies' business. While these laws may appear straightforward, we understand that their application can sometimes be complex.

Origen Technologies' Code, policies and guidelines are intended to help you navigate applicable laws and regulations. Origen Technologies has adopted a higher standard, and in many instances, the Code and our policies and guidelines exceed Origen Technologies' legal requirements. However, if a provision of the Code or another corporate policy or guideline ever conflicts with an applicable law or regulation, then Origen Technologies follows the applicable law. We are all expected to maintain a general understanding of the topics covered by the Code and our policies, and to identify any potential issues to our managers or the Legal Department. Origen Technologies also expects you to comply with all applicable Origen Technologies policies and guidelines and your individual agreements with Origen Technologies. Compliance is everyone's responsibility. If you are uncertain which Origen Technologies policies and guidelines apply to you or what course of action to take, consult our Legal Department before proceeding.

## OUR PRINCIPLES

### Treat Others with Dignity and Respect

Origen Technologies is committed to maintaining a healthy, safe, supportive, fun, and collaborative work environment. Origen Technologies supports diversity in our workforce and believes it is essential for our success, innovation, and competitive advantage. Our diversity and inclusion strategy are built around three key pillars: growing an increasingly diverse workforce, continuously cultivating a culture of inclusion, and driving positive change in our communities and across our industry. A culture of inclusion not only makes Origen Technologies a wonderful place to work, but it also drives the success of our business and helps us achieve our mission of making machine data accessible, usable, and valuable to everyone, while driving great outcomes for our customers, our business, our communities, and each other.

Each of us is expected to foster a respectful, non-retaliatory workplace environment that is free of harassment, intimidation, bias, and unlawful discrimination of any kind. This



includes handling customer and internal employee data with respect and in accordance with the secure practices outlined in our policies.

### Positive Environment

We are committed to making Origen Technologies a place where all people can thrive. Origen Technologies will not tolerate discrimination, harassment, or retaliation of any type.

Origen Technologies prohibits discrimination and harassment in any form — verbal, physical, virtual, visual, or otherwise. If you believe you have been discriminated against or harassed by anyone at Origen Technologies, or by an Origen Technologies partner, vendor, or other person, immediately report the situation to your manager or Human Resources. Managers who learn of any such situation must immediately report it to Human Resources or to our Legal Department. Origen Technologies will promptly investigate and take appropriate action.

*Q. How can I recognize if someone's behavior is a form of unlawful discrimination, harassment, or retaliation?*

*A. What is considered unlawful harassment varies from country to country.*

*Examples of unlawful discrimination or harassment may include, but are not limited to:*

- *Derogatory comments including gestures or jokes based on a legally protected characteristic, which may include gender, race, religion, national origin, or sexual orientation*
- *Sexual advances or innuendo*
- *Verbal or physical threats*
- *Offering employment benefits in exchange for sexual favors*
- *Displaying material that is derogatory, demeaning, or offensive regarding race, gender, or other protected characteristics.*

*Regardless of whether it is considered unlawful, Origen Technologies will not tolerate any behavior that creates an intimidating, hostile or offensive work environment. Any such behavior has no place at Origen Technologies.*

### Equal Opportunity Employment

Employment at Origen Technologies is based solely upon individual merit and qualifications related to professional competence and the legitimate needs of our business. Origen Technologies strictly prohibits unlawful discrimination based on legally protected characteristics.

### Healthy and Safe Workplace

Origen Technologies is committed to protecting the health and safety of our employees, visitors, and the public. This includes a commitment to environmentally sustainable practices and promoting the sustainable use of resources.

All employees, contractors, consultants, and others are expected to comply with health and safety laws and Origen Technologies policies. Origen Technologies does not tolerate any level of violence or the threat of violence in the workplace. Under no circumstances may anyone bring a firearm, explosive or other dangerous weapon or substance to work at any Origen Technologies-sponsored event, or to any off-site location where Origen Technologies business is conducted. In the event of potential violence or a dangerous situation, immediately contact local law enforcement and report it promptly to Global Safety and Security, your manager, Human Resources, or our Legal Department.





### Drugs and Alcohol

Origen Technologies' position on substance abuse is simple: It is not permitted. It is incompatible with our values as well as the health and safety of our people. Use good judgment and never drink in a way that leads to impaired performance or inappropriate behavior or endangers the safety of others. We are expected to use good judgment at Origen Technologies-sponsored events that serve alcohol and under no circumstances should we operate vehicles under the influence of alcohol or controlled substances. If you are impaired, Origen Technologies can assist you in procuring transportation or accommodation. Illegal drugs in our offices, at Origen Technologies-sponsored events or any off-site location where Origen Technologies business is conducted are strictly prohibited.

### Human Rights and Dignity

Origen Technologies respects the protection of internationally proclaimed human rights. Origen Technologies is committed to upholding the fundamental human rights of our fellow employees, and we expect our vendors, partners and others who provide services on behalf of Origen Technologies to adhere to the same high standards. Origen Technologies rejects all forms of child, forced, or slave labor and prohibits unlawful discrimination.

### Act Honestly, Ethically, and Lawfully

#### Avoid Conflicts of Interest

We have an obligation to always do what is best for Origen Technologies. A conflict of interest can arise if our private interests interfere, or appear to interfere, in any way with the interests of Origen Technologies. We should avoid even the appearance of a conflict of interest.

The following situations may give rise to a conflict of interest or the appearance of a conflict. Keep in mind that as circumstances change, a situation that previously did not present a conflict of interest may become one. Determining whether something is a conflict of interest is not always easy. If in doubt, reach out to your manager and the Legal Department.

#### Personal Investments

Avoid making personal investments in outside companies that are Origen Technologies competitors, customers, vendors, or business partners, which can easily create, or appear to create, a conflict of interest with Origen Technologies. A less than 1% interest in a public company is generally not an issue.

#### Outside Employment, Advisory Roles, Board Seats and Starting Your Own Business

Accepting employment, advisory positions, board seats or other affiliations with Origen Technologies competitors, customers, vendors, or business partners could, or could appear to, influence our judgment in a way that could harm Origen Technologies. In addition, engaging in outside employment or contract work may also create a conflict or the appearance of a conflict depending on the work being done and the time commitment required. Notify your manager and seek approval from our Legal Department before accepting or engaging in any of these opportunities. We should not start a business that competes with Origen Technologies' current or foreseeable future business, affects our ability to do our job at Origen Technologies, or uses Origen Technologies confidential or proprietary information or resources without appropriate written approval.

In addition to this Code, additional obligations arise under the non-disclosure or any invention assignment and confidentiality agreements you may have in place with Origen Technologies.

#### Business Opportunities Found Through Work



Business opportunities discovered through our work with Origen Technologies belong to Origen Technologies. Additionally, you may not compete with Origen Technologies directly or indirectly. We are all expected to lawfully advance Origen Technologies' interests.

#### **Inventions**

Developing or helping to develop inventions outside of Origen Technologies that (i) relate to Origen Technologies' existing or reasonably anticipated products or services; (ii) relate to your position at Origen Technologies; or (iii) are developed using Origen Technologies confidential or proprietary information or resources likely create conflicts of interest. Refer to your invention assignment or any other employment agreements you may have with Origen Technologies for additional obligations.

#### **Friends and Relatives**

Avoid participating in any situation in which you are hiring, managing, supervising, or conducting Origen Technologies business with a relative, spouse, significant other or any other individual which could impair or have the appearance of impairing your objectivity. Origen Technologies in its sole discretion may refuse to hire, engage in business with, or place such individuals in a position where the potential for actual or perceived favoritism or conflict of interest exists.

#### **Co-Worker Relationships**

Romantic relationships between coworkers can create a conflict of interest or the appearance of a conflict of interest, depending on the work roles and respective levels and positions of the coworkers involved. You are responsible for avoiding situations where your personal relationships may create a conflict of interest or the appearance of a conflict of interest.

All employees should refrain from engaging in a romantic relationship with anyone they supervise, with anyone in their direct reporting line, or anyone over whose employment they have any influence. Note that even if an employee is not a manager, a romantic relationship between an employee and a person over whose employment they could potentially influence can create a conflict of interest or the appearance of a conflict. If you are in any romantic relationship with another Origen Technologies employee that may create a potential conflict of interest, or the appearance of a conflict, you must immediately disclose such relationship to Human Resources.

In any case of conflict or where the appearance of a conflict arises, parties may be separated by reassignment or terminated from employment at the discretion of Origen Technologies, in accordance with applicable law. Contact your manager, Human Resources, or the Legal Department for further guidance on this important topic.

#### **Use of Origen Technologies Products and Services**

We may not use Origen Technologies products, services or information in a way that improperly benefits us or our friends and relatives.

#### **Endorsements and Political Activity on Origen Technologies' Behalf**

Associating Origen Technologies with or indicating Origen Technologies endorsement for, any civic, nongovernmental, religious, political, or professional association without approval from Origen Technologies is strictly prohibited. Additionally, speaking on any public issue or making a political campaign contribution on behalf of or as a representative of Origen Technologies without Origen Technologies' written consent is not permitted. We are free to contribute to and endorse political campaigns or activities in our personal capacity, but in doing so must not suggest any endorsement by Origen Technologies,





including by signing a personal comment with our Origen Technologies title or with any reference to Origen Technologies. We are required to obtain approval in advance from Origen Technologies' Legal Department for any Origen Technologies business activity that involves lobbying, or communication with, any member or employee of a federal, state, or local legislative body or executive branch entity. This includes retaining third parties to act on Origen Technologies' behalf.

### Accepting Gifts, Entertainment and Other Business Courtesies

Accepting gifts, entertainment and other business courtesies from a competitor, customer, vendor, or business partner often creates the appearance of a conflict of interest, especially if the item is lavish. Generally, acceptance of inexpensive "token" non-cash gifts is permissible. In addition, infrequent and moderate business meals and entertainment with outside companies can be appropriate aspects of many Origen Technologies business relationships, provided they are not excessive, do not create the appearance of impropriety and further the business relationship between Origen Technologies and the outside company. As this is an area of intense scrutiny, subject to significant civil and criminal penalties and may run counter to Origen Technologies' high expectations and ethical practices, it is strongly recommended that before accepting any gift or courtesy, you may need to obtain manager or Legal Department approval in advance.

*Q. How can I identify a potential conflict of interest?*

*A. Ask yourself:*

- *Would this activity benefit, or appear to benefit, me, my friends, or my family, at the expense of Origen Technologies?*
- *Would this activity harm my or Origen Technologies' reputation, negatively impact my ability to do my job at Origen Technologies, or potentially harm Origen Technologies?*
- *Would this activity embarrass Origen Technologies or me if it showed up on the front page of a newspaper or in a blog?*

*If the answer to any of these questions is "Yes," the relationship or situation is likely to create a conflict of interest, and you should avoid it or seek guidance from your manager or our Legal Department.*

### Disclosing Personal Interests

*If you have a significant financial interest in a transaction involving Origen Technologies — including an indirect interest through a relative or significant other or a business entity — you must disclose that interest and seek guidance. This is called a "related party transaction" and must be conducted in such a way that no preferential treatment is given to that business.*

*Q. What are some scenarios where conflicts of interest may arise?*

*A. Below are a few examples of ways conflicts of interest may arise:*

- *Doing business with relatives, significant others, or close friends*
- *Doing work that competes with Origen Technologies' business*
- *Outside employment or contracting work*
- *Using Origen Technologies property, time, resources, information, relationships, or position for personal gain*
- *Joining an advisory board or board of directors of another company*
- *Writing books or participating in speaking engagements that divulge sensitive information*
- *Acquiring ownership interest in companies that compete or partner with Origen Technologies*



### Conduct Business Fairly, Openly and Responsibly

Origen Technologies competes based on the merits of its people, products, and services. Origen Technologies does not condone, support, or tolerate behavior that compromises its ability to compete fairly based on merit.

### **Be Honest and Trustworthy in Your Dealings with Others, Including Customers, Partners, and Vendors**

We are passionate about our customers and products. To establish and maintain strong, long-lasting relationships, we must act with integrity and be honest and trustworthy in all our dealings with customers, partners, vendors and other third parties. While involved in proposals, bids, or contract negotiations, we must communicate honestly. We must only enter into agreements on behalf of Origen Technologies that contain terms which Origen Technologies can honor. We should never take advantage of others through manipulation, concealment, abuse of confidential or proatprietary information, misrepresentation of material facts, anticompetitive conduct, or any other unfair practice. We must honor the commitments we make to our customers and partners regarding how we will use the data we collect from them. If you have any questions about your use of data, contact your manager.

### **Comply With Antitrust and Competition Laws**

We must fully understand and comply with all applicable antitrust and competition laws and any Origen Technologies policies, guidelines or rules of engagement that reflect these laws. Certain conduct is absolutely prohibited under these laws and could result in severe penalties for Origen Technologies, individual liability and even jail. These issues include price fixing, bid rigging, colluding with competitors, or abusing market power. Since Origen Technologies operates globally, we must remain mindful that the laws of other countries in which our conduct has an effect may apply.

#### *Examples of prohibited conduct under Antitrust and Competition Laws*

- *Agreeing with competitors about prices*
- *Agreeing with competitors to rig bids or to allocate customers or markets*
- *Agreeing with competitors to boycott a supplier or customer*
- *Sharing competitively sensitive information (e.g., prices, costs, margins, distribution, etc.) with competitors*
- *Entering a business arrangement or engaging in conduct with the sole purpose of harming a competitor*
- *Using Origen Technologies' size or strength to gain an unfair competitive advantage*

### **Competitors and Former Employers**

Origen Technologies competes vigorously, but fairly, with our competitors. We do not want, nor will we use, confidential information about our competitors or our employees' former employers. This includes not only items such as customer lists, pricing information or trade secrets, but also confidential corporate data that you may have been exposed to at a prior place of employment. You should think of confidential corporate data, even if anonymized or de-identified, as a third-party corporate asset that you may not bring into Origen Technologies. We may use any publicly available information about competitors or other companies, but we may not unlawfully acquire or misuse their trade secrets or other confidential information, including data. If you come into possession of a third party's confidential information without their consent or if you are uncertain if appropriate consent was given, contact your manager immediately.

You are also expected to comply with any continuing obligations to a former employer, which may include various restrictions identified in prior employment agreements. For example, and depending on applicable laws, you may be prohibited from soliciting former





colleagues to work at Origen Technologies, or you may be prohibited from competing against a former employer. Please remember that agreements between you and your former employer create individual obligations that can create personal liability. Origen Technologies also expects you to meet your continuing obligations to Origen Technologies should you move to another company.

### **Follow Trade Control and Antiboycott Laws**

U.S. and international trade laws control where Origen Technologies can send or receive its products and/or services. The U.S. and other countries restrict the export (and in some cases, import) of goods, software, and technology, such as encryption technologies, which could have military or other applications and could pose a threat to the interests of the country restricting the export. Additionally, the U.S. government restricts exports of nearly all goods, software, and technology to certain sanctioned countries, persons, and entities, and broadly prohibits other types of transactions or dealings with these countries, persons, and entities. An export can also include the disclosure of controlled U.S.-origin technology or software source code to any non-U.S. person, whether that person is in the U.S. or another country. Further, U.S. antiboycott laws prohibit and penalize U.S. companies and persons from participating in or agreeing to participate in unsanctioned non-U.S. boycotts, such as the Arab League boycott of Israel.

If you are involved in sending or making available Origen Technologies software, services, or any form of technical data from one country to another, work with your manager to be sure that the transaction stays within the bounds of applicable laws.

*Q. What is an unlawful export under U.S. law?*

*A. What constitutes an unlawful “export” can include but is not limited to:*

- *Exposing or allowing access by a non-U.S. national to controlled U.S. technical data (in the U.S. or abroad), or exporting without authorization to someone on a sanctions/denied person list or in an embargoed country*
- *Permitting the download of software from the U.S. into an embargoed country or by a sanctioned/denied person*
- *Transporting technical data or software on your laptop, or tools or equipment in your luggage to an embargoed country*

*Q. To which countries, entities or persons is Origen Technologies prohibited from exporting products under U.S. export laws?*

*A. The U.S. government maintains a number of embargoes and sanctions programs against countries, entities, and persons. As of February 1, 2019, U.S. law prohibits exports to: Cuba, Iran, North Korea, Syria and the Crimea region of Ukraine.*

*There are also targeted sanctions against certain countries and lists of prohibited persons and entities to whom Origen Technologies cannot export. These U.S. lists can be found at: <https://www.bis.doc.gov/index.php/policy-guidance/lists-of-parties-of-concern>.*

*The U.S. government will also impose restrictions on certain types of goods, technology, software, or services to countries not on the banned lists. In addition to U.S. sanctions, since Origen Technologies operates globally, we may be required to comply with sanctions levied by other applicable jurisdictions.*

### **Advertise and Market Truthfully**

Truthfulness is an important component of maintaining integrity. We have a legal and ethical responsibility to ensure that all of our advertising is truthful and not deceptive. We must market Origen Technologies' products and services based on their merits. We must also have substantiation for any public statements we make about our — or a competitor's





— products, services, or company. This obligation applies to any social media “influencers” or anyone who may endorse Origen Technologies products on social media or otherwise. This is not only required by law but is something we owe to our customers, prospective customers, and others.

### **Assist With Required Public Communications and Filings**

Origen Technologies is required to file periodic reports and other documents with regulatory authorities and may make other public communications, such as issuing press releases. We are expected to provide complete, accurate, fair, and timely information to help Origen Technologies with its reporting and disclosure obligations and public communications. If you believe that any disclosure is materially misleading or if you become aware of any material information that you believe should be disclosed to the public, notify your manager immediately.

### **Comply With Anti-Bribery Laws**

Like all global businesses, Origen Technologies is subject to domestic and international laws that prohibit bribery. The rule is simple — do not bribe or accept a bribe from anybody, at any time, for any reason. Also remember that cultural “norms” are never an excuse to make a bribe. As this is an area of intense scrutiny, subject to significant civil and criminal penalties and may run counter to Origen Technologies’ high expectations and ethical practices, be extremely careful when giving gifts or paying for meals, entertainment, or other business courtesies on behalf of Origen Technologies. Avoid the possibility that the gift, entertainment or other business courtesy could be perceived as a bribe by providing such courtesies infrequently and keeping their value moderate. Never give cash or cash equivalent gifts (e.g., gift cards), or lavish gifts or courtesies. Any gift, entertainment, or courtesy must be directly related to a legitimate business purpose, such as discussing or educating the third party about Origen Technologies or its products or services, and it must be properly and accurately expensed and reported in our financial records. Before providing any business courtesies contact - your manager if you have any questions.

### **Interacting With Government Officials**

Offering gifts, entertainment, business courtesies or other things of value that could be perceived as bribes becomes especially problematic when interacting with a government official. The definition of “government official” is broad and includes any national, regional, or local government employee, candidate for public office, or employee of government owned or controlled companies or enterprises, public international organizations, public universities, or political parties. In addition to higher-level employees, government officials can also include administrative employees, such as assistants, secretaries, or clerks. Things of value include traditional gifts, but also things like meals, travel, entertainment, political or charitable contributions, and job offers for government officials’ relatives.

By contrast, it may be permissible to make infrequent and moderate expenditures for gifts and business entertainment for government officials that are directly tied to promoting our products or services (e.g., providing a modest meal at a day-long demonstration of Origen Technologies products), assuming they are permitted under local law and the official’s internal policies. Payment of such expenses may require pre-approval before giving any gifts or business courtesy to a government official, obtaining any required preapproval. If you aren’t sure what to do, contact your manager.

In the U.S., strict rules apply that severely limit the ability of a company or its employees to give gifts or business courtesies to a U.S. federal, state, or local government official, and limit the official’s ability to accept such gifts. This includes gifts or courtesies to members, officers and employees of the U.S. Senate and House of Representatives, as well as to employees of the U.S. executive and judicial branches. U.S. state and local government officials are also





subject to legal restrictions. For additional information please contact your manager.

Under the anti-bribery laws, we also have a legal duty to maintain accurate books and records. Each of us is required to describe all expenditures accurately and completely, and we must never mischaracterize the nature or the amount of any expenditure, gift, or other transaction.

### **Choose Partners with High Ethical Standards**

Origen Technologies' consultants, channel partners and other third parties may at times represent Origen Technologies in the marketplace and their actions may be attributed to Origen Technologies. We must make sure their conduct properly represents Origen Technologies and our standards and values. Before engaging such third parties, conduct careful and proper due diligence and check with your manager for required approvals.

*Q. What is considered a "bribe"?*

*A. While the definition varies from country to country, generally, a bribe is the giving, paying, promising, offering or authorizing the payment — directly or indirectly through a third party — of anything of value to someone to persuade that person to help obtain or keep business. For example, cash, gifts, donations to a cause supported by the recipient, or a job or internship to a family member of the recipient each may be considered bribes in certain situations. This is true even if you provide the "thing of value" from your personal finances.*

### *Selecting Good Business Partners*

*Who we do business with has a direct impact on our reputation and may have business or legal implications? By virtue of their role, many business partners will represent Origen Technologies and may be a customer's only interaction with Origen Technologies. When selecting a consultant, channel partner, or other third party, always engage only those that we trust will properly represent us and our values. Watch out for questionable business practices such as:*

- *Requesting payments in a different country or to a third party*
- *Requesting cash or untraceable funds*
- *Failing to disclose an affiliation with a government official or organization*
- *Appearing unqualified or having no prior professional experience*
- *Lack of necessary staff or facilities to perform the services agreed to*
- *Inexperience with or lack of knowledge about secure data handling practices*
- *Requesting unusual discounts or payments*
- *Lack of adequate financial record keeping*

*Because Origen Technologies can be held accountable for their actions, third parties who are engaged as our agents or representatives, such as distributors and resellers, are required to go through a comprehensive background check before becoming an Origen Technologies partner.*

### **Political Contributions**

You may not use any Origen Technologies funds or assets, or seek reimbursement, from Origen Technologies for contributions to any political candidate including any federal, state, local, or other political candidate, political party, political action committee or political advocacy group. Any participation or contribution to public policy developments on behalf of Origen Technologies must comply with applicable law and requires prior written approval by the General Counsel.

### **Public Sector Sales**



Public sector entities can include U.S. federal, state, local and educational entities, and their equivalents in other countries. When a public sector entity is our customer or the ultimate end customer, we are subject to different and often stricter requirements than when we work with commercial customers. If your work involves a public sector entity, you are responsible for knowing and complying with all applicable requirements. These requirements can be complex, and a violation can lead to serious financial and reputational harm for Origen Technologies including a prohibition on Origen Technologies doing business with the government.

#### Comply With Insider Trading Restrictions

During your work at Origen Technologies, you may have access to business information about Origen Technologies or its third parties that has not been disclosed to the public. If the information is something a reasonable investor would likely consider significant to a decision to buy, sell, or hold stock in Origen Technologies, it is considered “material nonpublic information.”

Buying or selling Origen Technologies or third-party stock while in possession of material nonpublic information or passing such information along to others so that they may buy or sell stock, is considered illegal insider trading. Insider trading not only violates the Code, but it also violates the law. Penalties are severe, including termination of employment in accordance with applicable law, monetary fines and even imprisonment.

*Q. If your work often involves information that is not public, does this mean you can never trade Origen Technologies stock?*

*A. Just because information is not public does not mean it's considered “material.” The law prohibits trading when in possession of information that is nonpublic and material. Information should be regarded as “material” if there is a substantial likelihood that a reasonable investor would consider it important in deciding whether to buy, hold, or sell a security. In general, any information that could reasonably be expected to affect the market price of a security is likely to be material. Some examples of information that may be regarded as material include, but are not limited to:*

- *Financial reports or performance*
- *Changes in certain senior executives or board members*
- *Proposed acquisitions, joint ventures, or divestitures*
- *New products or changes in product prices*
- *New equity or debt offerings*
- *Suspected or actual data breaches*
- *Significant litigation matters, internal investigations, and government inquiries and investigations*

*Note that the definition of “material information” may vary depending on the circumstances, and it is best to assume that information is material and consult with your manager if you have any questions.*

*Information is considered “nonpublic” if the information has not been broadly disseminated to the public for a sufficient period to be reflected in the price of the security. As a rule, information should be considered nonpublic until at least one full trading day has elapsed after the information is broadly distributed to the public.*

#### Comply With Money-Laundering Laws





Money laundering is an attempt by individuals or organizations to hide or disguise the proceeds of criminal activity through a series of otherwise legitimate business transactions. Origen Technologies does not tolerate the misuse of its systems as a vehicle to launder proceeds from improper activities. Origen Technologies forbids knowingly engaging in transactions that facilitate money laundering or result in unlawful diversion of funds. Promptly contact the - your manager if you become aware of any suspicious transaction or activity.

### Comply With Other Laws

Origen Technologies may be subject to other local, state, or federal rules, regulations, and laws in each of the countries in which we do business. For example, as we conduct business with the U.S. Federal government, we are subject to the requirements set forth in the Federal Acquisition Regulation (FAR).

### III. Preserve Confidentiality

In line with our culture of openness, Origen Technologies believes that the more we know about our goals, strategies, and initiatives, the more we are able to contribute to Origen Technologies' success. While openness is key to who we are and what we believe, we have an equally important obligation to balance that openness against our obligation to share confidential information — customer, employee, vendor, or partner — with only those who “need to know” and to secure it properly. Origen Technologies' “confidential information” includes all kinds of data — customer, financial, employee, product, vendor, and partner but some examples include:

- Financial results and metrics
- Customer information stored in Origen Technologies Cloud
- Personal or business contact information stored in business tools such as Salesforce, Workday or Jobvite
- Other personally identifying information, such as personal health or financial information, visitor, or employee kiosk information, including photos, and biometrics
- Personnel records
- Names and lists of customers and partners
- Contracts or proposals related to nonpublic business plans
- Product plans, roadmaps, and designs
- Marketing strategies
- Pricing policies
- Proprietary source code
- Information concerning potential or future mergers, acquisitions, or divestitures
- Internal email and other communications
- Information concerning litigation matters and government inquiries and investigations
- Strategic initiatives and plans.

At times, a particular project or negotiation may require disclosure of confidential information to another party. Disclosure of this information should be on a “need to know” basis and only under a non-disclosure agreement.

Be mindful of inadvertent disclosures of confidential information as well. For example, if you take any pictures, video, or audio recordings in the office, it is up to you to be sure that those pictures and recordings do not inadvertently capture confidential information. In some cases, those recordings may not comply with local law or Origen Technologies policy. Be thoughtful about what you make visible to others on whiteboards, computers, laptops and at your desk. Keep a clean desk and shred copies of printed materials containing confidential information when no longer needed.



Do not disclose confidential information about Origen Technologies or any of our third parties to friends, significant others, neighbors, or family members, and do not solicit confidential information from them about their companies.

Please note that nothing in this Code prohibits any rights or protections you may have to disclose confidential information in limited circumstances under local law.

*Q. How do I keep information confidential?*

*A. Do not disclose confidential information outside of Origen Technologies without authorization and proper protections in place, such as a non-disclosure agreement and confidence in the reliability of the receiving party to maintain confidentiality. However, our responsibilities extend beyond not disclosing confidential material — we must also:*

- *Properly secure, label and (when appropriate) dispose of confidential material*
- *Safeguard confidential information that we receive from others under non-disclosure agreements*
- *Take steps to keep trade secrets and other confidential intellectual property secrets*
- *Only accept as much confidential information from third parties as you need to accomplish your business objectives, even after a nondisclosure agreement is signed*
- *Confirm that all such information is properly used and returned or destroyed when appropriate*

#### Outside Communications and Research

Be thoughtful before posting opinions or information about Origen Technologies on the internet, including social media. Even if the information is not confidential, the statements may be unintentionally attributed to Origen Technologies. Avoid making personal comments or providing personal opinions that may be seen as an endorsement by, or attributable to, Origen Technologies. Do not speak on behalf of Origen Technologies unless you have been specifically authorized to do so. We should never discuss Origen Technologies or third-party confidential information on social media or elsewhere. We should never discuss Origen Technologies with the press, investors, or analysts unless we have been explicitly authorized to do so by Corporate Communications or Investor Relations. Get approval from your manager and Corporate Communications or Investor Relations before accepting any public speaking engagement where you will be discussing Origen Technologies, its products or services, or your role.

#### Government, Law Enforcement and Regulatory Inquiries and Investigations

Immediately consult with our Legal Department if a government or law enforcement officer or regulator requests any disclosure about Origen Technologies or our business activities. We are expected to work with our Legal Department in responding to requests by government and law enforcement officers and regulatory authorities to ensure appropriate responses and to avoid inappropriate disclosure of privileged or confidential materials.

### **Protect and Respect Origen Technologies' Assets**

We are committed to protecting Origen Technologies' assets. Our ability to do so depends on how well we conserve our resources and the steps we take to protect them.

#### Security and Data Protection Obligations

Origen Technologies has a responsibility to safeguard customers, employees, vendors, and partner information in accordance with our Acceptable Use and IT Security policies, methods, and standards. At times we may need a third party to access, collect, use, share, transfer, or store ("process") confidential information, including personal and sensitive information (described in the "Personal Information" section below), on our behalf. In these





instances, we conduct assessments to verify that the third parties meet Origen Technologies' privacy and security standards and require that they enter contracts with Origen Technologies confirming that our standards will be met. Before allowing a third party to process confidential information, be sure that the appropriate privacy and security assessment has been conducted, and any required contracts have been entered into with the third party. Engage the Procurement team, and they will also help you fulfil these requirements.

*At times we may need a third party to handle, store, collect or process sensitive or confidential information on our behalf. In these instances, we require a prior security assessment from a third party.*

*Be sure to conduct the appropriate due diligence, engage the information security operations team and have the appropriate agreement in place before you disclose the information.*

### Personal Information

We respect laws applicable to Origen Technologies' business regarding the protection of "personal information" (meaning names, contact information — personal or business — financial or credit card account numbers, photos, social media posts, IP addresses, or such other information that identifies or may lead to the identification of an individual), and its subset, "sensitive information" (meaning information regarding the health, biometrics, race, ethnicity, sexual orientation or political beliefs of an individual). We may process personal information only in compliance with our policies, contractual obligations, and the law. We are required to observe appropriate safeguards and security measures when processing personal information. If you are uncertain what they are, consult Origen Technologies' Acceptable Use Policy, Security Policies, and Data Protection Principles.

### Intellectual Property

Origen Technologies' intellectual property rights (e.g., our source code, patents, trademarks, designs, logos, copyrights, trade secrets and "know-how") are among our most valuable assets and provide Origen Technologies with a competitive advantage. Unauthorized use can lead to loss of value and may be catastrophic to our business. Maintaining the confidentiality of Origen Technologies' trade secrets and other confidential information is an essential element of protecting Origen Technologies' intellectual property.

Corporate Communications should approve any third-party use of Origen Technologies' intellectual property, including Origen Technologies' trademarks and logos, in advance. Report any suspected misuse of inventions/technology, source code, trademarks (including domain names owned by others that appear to implicate Origen Technologies trademarks), logos, copyrighted content/materials, or other Origen Technologies intellectual property to our Legal Department. Likewise, respect the intellectual property rights of others. Inappropriate use of others' intellectual property may expose Origen Technologies and you to criminal and civil liability. Seek advice from our Legal Department before soliciting, accepting, or using proprietary information from others, or letting others use or access Origen Technologies proprietary information. We must also check with our Legal Department before developing a product that uses content that does not belong to Origen Technologies, such as open-source software, copyrighted material, and third-party components.

### Origen Technologies Data

Origen Technologies acquires data from various sources — customers, employees and third parties. You should treat data just as you would any physical asset and assume that Origen Technologies, its customers, employees, vendors, or partners may have an ownership interest in it. We have an obligation to protect data, as we do any other asset, and to use it lawfully, in accordance with the relevant agreements, Origen Technologies policies and our



customers', employees', vendors' and partners' expectations. If you are not sure what they are, consult our Legal Department.

#### Origen Technologies Equipment, Facilities and Other Resources and Amenities

Origen Technologies provides us with the tools, equipment, and amenities to do our jobs effectively, and we are counted on to be responsible and not wasteful. Origen Technologies funds, equipment, and other physical assets are not to be used for purely personal use. Internet use that is not strictly Origen Technologies-related during business hours should be minimal. For questions, ask your manager or Human Resources. Origen Technologies is also committed to sustainable business practices, which includes complying with all applicable environmental laws and regulations, promoting the sustainable use of resources, and minimizing waste.

#### Audit and Supervision

While Origen Technologies respects employee privacy, we should not assume that the business information that we access, store, or share on our computers, tablets, mobile devices, or telephone equipment used in conducting Origen Technologies business are private or confidential. Subject to local laws and under the guidance of our Legal Department, Origen Technologies may monitor, search, and review such items and our desks, cubicles and other items stored on Origen Technologies' premises where there is a business need such as protecting employees and customers, maintaining the security of resources and property, or investigating suspected misconduct. Origen Technologies may be required by law (e.g., in response to a subpoena or warrant) to monitor, access and disclose the contents of corporate email, voicemail, computer files and other materials on our electronic facilities or on our premises. For further information, consult our Acceptable Use Policy.

Additionally, to protect our employees, assets, and business interests, Origen Technologies may ask to search for our personal property, including satchels and bags, located on, or being removed from Origen Technologies locations. We are expected to cooperate with all such requests. We, however, should not access another employee's workspace, including email and electronic files, without prior approval from our Legal Department. If we leave Origen Technologies for any reason, we must return all Origen Technologies assets, such as documents and media, which contain Origen Technologies proprietary or confidential information, and we may not disclose or use that information. Also, Origen Technologies' ownership of intellectual property, which we created as an Origen Technologies employee, continues after we leave Origen Technologies. Origen Technologies has and will continue to take every step necessary, including legal measures, to protect its assets.

#### Electronic Security

Origen Technologies' communications and the networks and hardware that support them (collectively, "Communications Network") are critical Origen Technologies assets. Be sure to follow our IT and Security-related policies, including our Acceptable Use Policy, when leveraging Origen Technologies' Communications Network, whether you do so over your Origen Technologies-issued laptop, mobile device, or other personal communications equipment. If you have any reason to believe that our network security has been compromised, immediately report the incident to Origen Technologies Global Security. Examples may include reporting a lost or stolen laptop or mobile device containing Origen Technologies communications or information, or a compromised password or other similar credentials.

#### Physical Security

We should take all reasonable steps to protect against loss or theft of any Origen Technologies assets or personal belongings. We should always secure our laptop (put it in a locked drawer overnight at the office), important equipment, and our personal belongings,





even while on Origen Technologies' premises. Always wear your Origen Technologies badge visibly while onsite. Do not tamper with or disable security or safety devices. Watch people who "tailgate" behind you through our doors. If you do not see an Origen Technologies badge and you do not know if they are employees, ask to see their badge. And, as appropriate, direct the person to the receptionist for assistance. In addition, we must all take steps to ensure our personal safety while travelling and working in other Origen Technologies offices. Always be mindful of your surroundings and take care to avoid any situations in which you do not feel comfortable. Promptly report any suspicious activity to Facilities or Security.

## **Ensure Financial Integrity and Personal Responsibility**

Financial integrity, fiscal responsibility and accurate reporting of our financial results and condition are core aspects of corporate professionalism and required by law. Each person at Origen Technologies — not just those in Finance — has a role in making sure that money is appropriately spent, financial records are complete and accurate, internal controls are honored, and that financial statements and other public and regulatory filings and communications are complete, timely and accurate. This matters every time we hire a new vendor, record an expense, enter into a new business contract, or enter into any transactions on Origen Technologies' behalf.

To make sure that we get this right, Origen Technologies maintains a system of internal controls to reinforce our compliance with legal, accounting, tax, and other regulatory requirements in every location in which we operate. If you believe that any disclosure is materially misleading or if you become aware of any material information that you believe should be disclosed to the public, notify our Legal Department immediately. We have an obligation to fully comply with each of these requirements. The core concepts below are the foundation of our financial integrity and fiscal responsibility:

### **Spending Origen Technologies' Money**

When spending money on Origen Technologies' behalf, make sure that the cost is reasonable, directly related to Origen Technologies business, and supported by appropriate documentation. Always record the business purpose (e.g., if you take someone out to dinner at Origen Technologies' expense, always record in the expense reimbursement tool the full names and titles of the people who attended as well as the business purpose of the dinner) and comply with other submission requirements. If you're uncertain about whether you should spend money or submit an expense for reimbursement, check with your manager. Origen Technologies maintains appropriate internal accounting controls to ensure that money spent on Origen Technologies' behalf is transferred only with management's approval and according to policies and procedures established by management. Managers are responsible for all money spent and expenses incurred by their direct reports and should carefully review such spend and expenses before approving.

### **Entering Contracts**

Each time we enter into a business transaction on Origen Technologies' behalf, there should be sufficient documentation to show that it has been approved by our Legal Department and the business owner responsible supporting the arrangement. Never sign any contract on behalf of Origen Technologies unless all of the following are met:

- You are expressly authorized to sign a contract under our Transaction Approval and Signature Authority Policy. If you are unsure whether you are authorized, ask your manager



- The contract has been approved by our Legal Department; if you are using an approved Origen Technologies form contract, you do not need further Legal approval unless changes are made to the form contract, or you are using it for other than its intended purpose
- You have studied the contract, understood its terms, and determined that entering into the contract is in Origen Technologies' interest
- If it involves the procurement of goods or services, it complies with Origen Technologies' procurement processes set forth in our Transaction Approval and Signature Authority Policy

All contracts at Origen Technologies must be in writing and must contain all the relevant terms to which the parties are agreeing and must be disclosed to Finance or Procurement as appropriate, in addition to the Legal Department. Origen Technologies does not permit any oral agreements or "side agreements." Be mindful that other persons and organizations may construe our actions to be authoritative and binding on Origen Technologies, so we must be sure to avoid making commitments or representations not in line with the Code and our Transaction Approval and Signature Authority Policy

The integrity, reliability, and accuracy in all material respects of Origen Technologies' books, records and financial statements are fundamental to Origen Technologies' continued and future business success. If your job involves the financial recording of our transactions, make sure that you are familiar with all of the Origen Technologies policies that apply. -No director, officer, or employee may cause Origen Technologies to enter into a transaction with the intent to document or record it in a deceptive or unlawful manner. In addition, no director, officer, or employee may create any false or artificial documentation or accounting entry for any transaction entered by Origen Technologies. Similarly, officers and employees who have responsibility for accounting and financial reporting matters have a responsibility to accurately record all funds, assets, and transactions on Origen Technologies' books and records, and to bring to the attention of the Audit Committee and Disclosure Committee any material information of which he or she may become aware that affect the disclosures made by Origen Technologies in its public filings or otherwise.

The CEO and each financial officer and employee shall promptly bring to the attention of the Audit Committee and the Disclosure Committee any information he or she may have concerned:

- Significant deficiencies in the design or operation of internal controls which could adversely affect Origen Technologies' ability to record, process, summarize or report financial data
- Any fraud, whether or not material, which involves management or other employees who have a significant role in Origen Technologies' financial reporting, disclosures, or internal controls

Employees may report any such concern through any of the channels identified in the Code, including the Legal Department or through Origen Technologies' Ethics and Compliance Hotline. Origen Technologies prohibits retaliation against any employee who in good faith reports or participates in an investigation of a possible violation of our Code.

### Recording Transactions

If your job involves the financial recording of our transactions, make sure that you are familiar with all the Origen Technologies policies that apply, including our Travel and Expense Policy and our Transaction Approval and Signature Authority Policy the Related Party Transactions Policies and Procedures, and other finance-specific policies.





Immediately report any transactions that you think are not being recorded correctly to Finance or our Legal Department.

#### Reporting Financial or Accounting Irregularities

We should always fully cooperate and never interfere in any way with the auditing of Origen Technologies' financial records. Similarly, we should never falsify any record or account, including time reports, expense accounts and any other Origen Technologies records. Immediately report any suspected misconduct mentioned above or any irregularities relating to financial integrity or fiscal responsibility, no matter how small, to our Finance or Legal Department.

#### Hiring Suppliers

We are continuously entering into transactions with suppliers of goods and services and should seek to engage with reputable business partners whose values and business practices are consistent with Origen Technologies' high standards of compliance and integrity. Be sure to engage Procurement to facilitate the bid and selection process. While price is very important, quality, service, reliability, and the terms and conditions of the proposed transaction may also affect the final decision. Performing due diligence on suppliers is important and expected. Review the Transaction Approval and Signature Authority Policy and contact Procurement for any questions regarding how to procure goods or services.

#### Retaining Business Records

It's important that we appropriately manage our business records. Various laws require that we keep certain records for minimum periods of time, however, it is equally important to know when to periodically dispose of documents that are no longer useful or do not need to be retained. In addition, if asked by our Legal Department to retain records relevant to a litigation, audit, or investigation, it is critical that we do so until our Legal Department informs us that retention is no longer necessary. For guidance on what to keep and for how long, please refer to Origen Technologies' policies on records and information management.

#### Providing Loans

Origen Technologies is prohibited from providing loans to directors and executive officers. Loans from Origen Technologies to other officers and employees must be approved in advance by the Board of Directors or its designated committee.

#### More on Retaining Good Business Records

All business records should be maintained in reasonable detail, must appropriately reflect Origen Technologies' transactions, and must conform both to applicable legal requirements and to Origen Technologies' system of internal controls. Examples of business records include expense reports, invoices, financial reports, personnel files, business plans, contracts, customer lists, and marketing information. Depending on its content, an email may be considered a business record. If you are unsure whether something is a business record, contact our Legal Department. Business records and communications often become public, and we should avoid exaggeration, derogatory remarks, guesswork, or inappropriate characterizations of people and companies that can be misunderstood.

### **WHAT IF I HAVE A CODE OR POLICY-RELATED QUESTION OR CONCERN?**

If you have a question or concern about the Code, Origen Technologies' expectations, or any of our policies, contact our Legal Department. If you observe behavior that concerns you, or that you think may be a violation of our Code, or a policy, you have multiple options for raising issues and concerns. You can contact any of the following:



- Your manager
- Our Legal Department
- Any senior personnel in Finance
- Human Resources
- Our Ethics and Compliance email: [ethics@origentech.com](mailto:ethics@origentech.com)
- We must all ensure prompt and consistent action regarding potential violations of our Code. However, in some situations it is difficult to know if a violation has occurred. While we cannot anticipate every
- 
- Make sure you have all the facts. To reach the right solutions, we must be as fully informed as possible.
- Ask yourself: What specifically am I being asked to do? Does it seem unethical or improper? This will enable you to focus on the specific question you are faced with, and the alternatives you have. Use good judgment and common sense — if something seems unethical or improper, it probably is.
- Clarify your responsibility and role. In most situations, there is shared responsibility. Are your colleagues informed?
- Discuss the problem with your manager. This is the basic guidance for all situations. In many cases, your manager will be more knowledgeable about the question and will appreciate being brought into the decision-making process. Remember that it is your manager's responsibility to help solve problems, which often will include escalating any issues to Human Resources or the Legal Department.

### No Retaliation

Origen Technologies prohibits retaliation against any employee who in good faith reports or participates in an investigation of a possible violation of our Code. If you believe you are being retaliated against, contact any of the available resources listed above in this section. Origen Technologies will promptly investigate any suspected violations of the Code. You are expected to cooperate truthfully and responsively in internal investigations of misconduct. Intentionally misleading Origen Technologies is a violation of trust between you and Origen Technologies and is a violation of our Code.

Origen Technologies will take prompt and appropriate action against those who violate the Code. Disciplinary actions may be taken, up to and including termination of employment or business relationship in accordance with applicable law. Certain violations of this Code may also be subject to civil or criminal prosecution by governmental authorities and others.

#### *Q. If I report an actual or possible violation, will it remain confidential?*

A. Any reported violation will be kept confidential to the extent possible consistent with applicable laws and business needs. You may report violations or suspected violations anonymously or by identifying yourself. Keep in mind, however, that in some circumstances, it might be more difficult or even impossible for Origen Technologies to thoroughly investigate anonymous reports. Origen Technologies therefore encourages you to share your identity when reporting. Although reports of violations or suspected violations may be made verbally, you are encouraged to make any such reports in writing, which will assist the investigation process.

### WAIVERS AND AMENDMENTS

An exemption from any part of the Code will be granted only in rare and compelling circumstances, regardless of position. Any exemption from the Code must be approved in writing in advance by Origen Technologies' General Counsel in accordance with the appropriate policy or guidelines. In addition, for members of Origen Technologies' Board of





Directors and executive officers, exceptions to compliance with the Code may require written approval by Origen Technologies' Board of Directors, public disclosure under applicable law, or such other procedural requirements set forth in our corporate governance guidelines, a Board committee charter or other Origen Technologies policy. We are committed to regularly reviewing and updating our policies and procedures, including our Code. Any amendments to the Code will be posted on our website.

#### POLICIES AND GUIDELINES

The Code does not address all workplace conduct. Origen Technologies maintains additional policies and guidelines that may provide further guidance on matters covered by the Code or address conduct not covered by the Code. We have noted a few of those corporate policies and guidelines throughout the Code. You can access these and other policies and guidelines on our intranet or directly from anyone in Human Resources or our Legal Department.

#### CONCLUSION

It is impossible to spell out every possible ethical scenario we might face. Instead, we rely on one another's good judgment to do the right thing and uphold a high standard of integrity for Origen Technologies and ourselves. Origen Technologies expects us to be guided by both the letter and the spirit of the Code. Sometimes, identifying the right thing to do is not an easy call. If you are not sure, do not be afraid to ask questions of your manager, our Legal Department, Finance or Human Resources. And remember ... if you see something that you think is not right, speak up. We have worked hard to create a wonderful place to work, let us work hard to protect it.

Julio 5, 2022