



Code of Conduct



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At Jadex, we pride ourselves on being a world-class leader in advanced manufacturing and material science. Behind our core competencies lies a foundation of our associates rooted in the commitment to do what is right and to leave a positive lasting impact for our customers and environment.

Jadex has not gotten to where we are today without upholding extremely high standards for our associates to ethically conduct business. Our companies, processes, and products are only so valuable without an honorable reputation behind them.

The IDEAS Behind Jadex define our strategic path and our Code of Conduct serves as a guide for how we are to behave. We ask that you personally commit to embrace the IDEAS and strictly adhere to our Code, each and every day. Always hold yourself and others accountable to a high ethical standard and never be afraid to ask questions if you're unsure about a situation. Success can only be achieved by each of us living out our culture together.

We want to personally thank each of you for helping lead Jadex into the future with a reputation we all can be proud of.

The IDEAS Behind Jadex



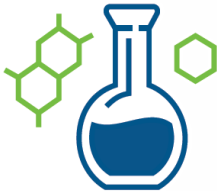
INTEGRITY ABOVE ALL

We choose responsibility — responsibility to do the right thing for our employees, our customers, our community, our environment, and our children’s future. We commit to being proud of our choices, always.



DELIVER ON COMMITMENTS

“Do what you say and say what you mean.” We believe that’s the only philosophy worth living and working by.



EMBRACE INNOVATION

Creativity is a necessity. Every day, we use original thinking and disruptive technology to push our products’ quality further, never compromising.



ACCELERATE GROWTH

Velocity is key. When it comes to inspiration, curiosity, and well-being, we don’t simply follow market standards. We set them.



STRATEGIC INTENTION

We’re calculated. Every decision we make is with the “bigger picture” of our company in mind — from the types of partners and customers we want to work with, to the potential mergers and acquisitions that can increase our enterprise value, to the boundaries we push for technology and sustainability.

Purpose of the Code

This Code of Conduct is built around the recognition that everything we do in connection with our work at Jadex Inc., including each of its subsidiaries and affiliates, will be, and should be, measured against the highest possible standards of ethical business conduct. Our commitment to the highest standards helps us to hire great people, manufacture great products, and attract loyal customers. As used herein, Jadex Inc. collectively with each of its subsidiaries and affiliates may be referred to as “Jadex”, the “Company” or “us”/“we”).

Take Responsibility

You have a responsibility to yourself, your co-workers and our Company to conduct business legally and ethically. Make sure you understand our Code. If you are unclear about your responsibilities, or what the right thing to do is, speak up and ask. You will be required to certify regularly that you have read and complied with our Code.

Try to stop violations of our Code before they occur. If you suspect that there has been a violation, let someone know. Ignoring problems only makes them worse and can damage the trust we have built with our stakeholders and with each other. When you take action, including speaking up about potential violations of our Code, you help us address problems that could harm others or our Company.

Our Code applies to all of us

- Employees of Jadex regardless of location, seniority, business division or function.
- Executive Officers.
- Our third parties, including agents, representatives, independent contractors and consultants, must follow standards equivalent to our Code.

We all must follow the provisions in our Code. In rare circumstances where you believe that a waiver of a provision of our Code is needed, you must request approval from the VP Human Resources.

Do the Right Thing

A decision tree can be a useful tool when you are faced with a difficult situation. Ask yourself the questions below. In most situations, proceeding with the wrong path can have serious consequences for the Company. If you are not sure, seek guidance in making sound, ethical decisions. Questions to ask:

- *Is it illegal?*
- *Is it inconsistent with our Company values and Code of Conduct?*
- *Am I being dishonest?*
- *Is this contrary to the best interest of our Company and Stakeholders?*
- *Would I feel concerned if this appeared in a news headline?*
- *Do I feel this may be wrong but feel pressure to do it anyway?*

If your answer is “yes” to any of these questions, or if you are unsure of the answer, do not proceed. Ask someone for guidance to ensure that we do the right thing.

Your commitment to integrity is not only about doing the right thing yourself but speaking up when you see or suspect anything unethical or illegal. Comments such as these may tip you off to a possible Code violation – if you hear such comments, speak up:

- *“We’ll just do it this once.”*
- *“Go ahead – take care of it when no one’s watching.”*

- *“No one will know the difference.”*
- *“Just make the numbers work.”*
- *“Do it now and figure it out later.”*

When you do the right thing, you protect the reputation built by generations of employees before you.

Reporting/Speaking Up

The most effective and efficient method to resolve concerns is internally, through two-way conversation with your manager or members of the leadership team including, for example, Human Resources. Often our managers and local leadership teams are closest to the issue and can respond quickly to your concern. The most appropriate method for raising your concern may depend on the issue, the people involved, and local and geographic laws and regulations. We understand that, at times, and for reasons that may be very personal to you, you may need an anonymous method of reporting a concern. In these cases, contact the Jadex Ethics and Compliance Hotline which allows you to submit a concern anonymously.

The Ethics and Compliance hotline phone number: 866-285-2725

No Retaliation

When you seek advice, raise a concern, report suspected misconduct, cooperate with an investigation, or participate in any activity protected by law you are complying with our Code, living our values and promoting our culture. You will not be retaliated against in any way for doing so.

Forms of retaliation include losing your job, being demoted, suspended, threatened, harassed, victimized or being discriminated against. We take claims of retaliation seriously — anyone found to have committed a retaliatory act is subject to disciplinary action, up to and including termination. If you or someone you know is the victim of retaliation, report it to your supervisor or Human Resources immediately. See HR-001: Equal Employment and Anti-Harassment Policy for more information.

Equal Opportunity

Employment at Jadex is based solely upon individual merit and qualifications directly related to professional competence. We strictly prohibit unlawful discrimination or harassment on the basis of race, color, religion, veteran status, national origin, ancestry, pregnancy status, sex, gender identity or expression, age, marital status, mental or physical disability, medical condition, sexual orientation, or any other characteristics protected by law. We also make all reasonable accommodations to meet our obligations under laws protecting the rights of the disabled unless doing so would cause an undue hardship on Jadex. Please refer to your applicable state law supplement for additional information. See HR-001: Equal Employment and Anti-Harassment Policy for more information.

Harassment, Discrimination, and Bullying

Jadex prohibits discrimination, harassment and bullying in any form – verbal, physical, or visual, as discussed more fully in our Equal Employment & Anti-Harassment Policy and state law supplements. If you believe you’ve been bullied, harassed, or discriminated against by anyone at Jadex, or by a Jadex partner or vendor, you should immediately report the incident to your supervisor, Human Resources or both. Similarly, supervisors and managers who learn of any such incident must immediately report it to Human Resources. In response, Human Resources will promptly and thoroughly investigate any complaints and take appropriate action. We take claims of harassment, discrimination, and bullying seriously — anyone found to have committed an act(s) of harassment, discrimination, or bullying is

subject to disciplinary action, up to and including termination. See HR-001: Equal Employment and Anti-Harassment Policy for more information.

Drugs and Alcohol

Being under the influence of alcohol or non-prescription drugs while working is strictly prohibited. Illegal drugs in our offices or at sponsored events are strictly prohibited. If a manager has reasonable suspicion to believe that an employee's use of drugs and/or alcohol may adversely affect the employee's job performance or the safety of the employee or others in the workplace, the manager may request an alcohol and/or drug screening. A reasonable suspicion may be based on objective symptoms such as the employee's appearance, behavior, or speech, in accordance with applicable law. For more information, Refer to HR-004: Drug-Free and Alcohol-Free Workplace Policy.

Healthy and Safe Work Environment

No production goal, cost savings, time savings or competitive advantage is worth an injury or illness of any kind. Our Company's occupational safety standards and guidance are based on industry best practices. We are committed to providing a workplace that meets or exceeds applicable occupational safety and health laws and regulations.

We continually strive to improve our occupational safety and health performance. Our Company regularly conducts reviews of our facilities and audits our safety practices. You can do your part by following safety and health requirements and promptly reporting any workplace accidents, injuries, illnesses or unsafe conditions, including "near-misses." Refer to HR-003: Incident Reporting Policy for more information.

Maintaining a Secure Environment

Dangerous items of any nature such as weapons, explosives or firearms are not permitted on Company property, or to be in our possession or on our person while we are conducting Jadex business off-site. Theft of any kind is not tolerated.

Promptly follow your site's protocols and contact EHS, Human Resources or your manager if you observe any inappropriate or dangerous behavior. Any violations of these guidelines for maintaining a safe environment are grounds for disciplinary action, up to and including potential termination in accordance with local laws. Refer to HR-002: Workplace Violence Policy for more details.

You should ensure our facilities are secure at all times. This means you should not allow anyone entry to a Jadex facility who does not have proper security access (badge swipe, biometrics, etc.). If a person is following you and they do not have the proper security access, instruct them to go to the designated reception area. All visitors must enter the facility via the main entrance and sign a visitor log. Report suspicious individuals on our Company property to EHS.

Commitment to Fair Labor Practices

We maintain a deep respect for human rights and are committed to ensuring fair labor practices.

Our Company complies with laws and regulations directed at protecting the health and safety of the global workforce. We comply with legislation focused on eliminating slavery and human trafficking from global supply chains, including the UK Modern Slavery Act. Our Company rejects, and will not knowingly use business partners that engage in, inhumane labor practices, including:

- The exploitation of children and the use of child labor

- Physical punishment
- Forced or compulsory labor
- Human trafficking

Our Company engages in ethical labor practices, and we work with business partners who promote the same, including:

- Fair wages in accordance with all applicable wage and hour laws (see HR-005: Overtime and Hours Worked Policy).
- Non-discrimination and equal opportunity for all employees (see HR-001: Equal Employment and Anti-Harassment Policy).
- Supporting lawful freedom of association and recognizing the right to collective bargaining.

Conflicts of Interest

When you are in a situation in which competing loyalties could cause you to pursue a personal benefit for you, your friends, or your family at the expense of Jadex or our Customers, you may be faced with a conflict of interest. All of us should avoid conflicts of interest and circumstances that reasonably present the appearance of a conflict.

When considering a course of action, ask yourself whether the action you're considering could create an incentive for you, or appear to others to create an incentive for you, to benefit yourself, your friends or family, or an associated business at the expense of Jadex. If the answer is "yes," the action you're considering is likely to create a conflict of interest situation, and you should avoid it.

Below, we provide guidance in some common areas where conflicts of interest often arise:

- 1) Personal Investments: Avoid making personal investments in companies that are Jadex competitors or business partners when the investment might cause, or appear to cause, you to act in a way that could harm Jadex.
 - If an investment could potentially affect your business decisions, do not make the investment, including investing in a business that could be a potential competitor.
 - Do not invest in a privately owned supplier, competitor or customer of our Company.
 - Owning a de minimis percentage of stock of a publicly held supplier, competitor or customer, so long as the investment is not so financially substantial as to create the appearance of a conflict of interest.
- 2) Family and personal relationships: Avoid participating in management of or decision-making regarding potential or existing Jadex business relationships that involve your relatives, spouse or significant other, or close friends.
 - You must not supervise a family member or partner.
 - Inform your manager if you are supervising someone you have a personal relationship with, such as a close friend.
 - Inform your manager if you are considering hiring someone with whom you have a personal relationship.
 - Inform your manager if you have a personal relationship with someone employed by a vendor or supplier that you are considering using to conduct Company business.
 - Inform your manager if you have a family member or a close personal contact who is a public official.

- 3) Outside employment, advisory roles, board seats, and starting your own business: Avoid accepting employment, advisory positions, or board seats with Jadex competitors or business partners when your judgment could be, or could appear to be, influenced in a way that could harm Jadex. Additionally, because board seats come with fiduciary obligations that can make them particularly tricky from a conflict of interest perspective, you should notify your manager before accepting a board seat with any outside company. Finally, do not start your own business if it will compete with Jadex.
- 4) Contacts with competitors, suppliers, vendors or customers: Avoid engaging in activities or relationships with third parties that might cause, or appear to cause, you to act in a way that could harm Jadex.
 - You must not have an ownership interest, work for, or provide services to a competitor, supplier or customer.
 - You must not make requests to, or comply with requests from, customers, suppliers or vendors to make charitable contributions on behalf of the Company (unless sponsored by the Company's Corporate Giving Program).
 - You must not conduct other-than-Jadex business with our vendors, suppliers, customers or contractors.
- 5) Personal Gain: Do not use or divert corporate opportunity, property, information or your position at our Company for personal gain or to compete with our Company.

In each of these situations, the rule is the same – if you are considering entering into a business situation that creates a conflict of interest, don't. If you are in a business situation that may create a conflict of interest, or the appearance of a conflict of interest, review the situation with your manager and Human Resources. Finally, it's important to understand that as circumstances change, a situation that previously didn't present a conflict of interest may present one.

Gifts, Entertainment, and Other Business Courtesies

Gifts, entertainment and other business courtesies can promote positive relationships; however, we must ensure that there is no suggestion of a conflict of interest, or appearance of an improper attempt to influence business decisions, associated with such activities.

When giving or receiving a gift or entertainment neither party should feel that they must do something, including promising business, in return for the gift or entertainment.

Never give or accept gifts or entertainment that are illegal, inappropriate or would violate our commitment to inclusion and mutual respect. All entertainment that is given or received must be in furtherance of a legitimate business purpose, such as team building.

When in doubt as to whether gifts or entertainment are reasonable and appropriate, ask your manager or Human Resources.

In general, you may accept or provide a business associate:

- Gifts that are infrequent and nominal in value.
- Occasional, reasonably priced meals at venues that are appropriate for conducting business.
- Occasional tickets to local sports, theater or other cultural events, when tickets are purchased at a reasonable price and are an integral part of business building activities.

You may not accept or provide a business associate:

- Gifts that are high in value (more than \$50 US dollars).
- Gifts that are in the form of cash, checks, money orders, gift certificates, loans or other cash equivalents.
- Gifts or entertainment that violate the law, our Company policy, or the recipient's Company policy.

Protection and Proper Use of Company Assets

Our Company provides you with the resources you need to do your job. These resources are physical, like our buildings and machines and electronic, like our e-mail, software, and internet. All are valuable Company assets and should be protected from theft, loss, damage, unauthorized access, waste and abuse.

You should be a good steward of Company property and equipment. We trust you to use our Company resources to conduct company business and to maintain these resources with care. Promptly report any property or equipment that appears damaged, unsafe, defective or in need of repair.

You should be responsible in use of social media. Social media tools such as blogs, wikis, chatrooms and networking sites provide an outlet to communicate about our Company with stakeholders. However, you must be careful when communicating about our Company online and should have no reasonable expectation of privacy in publicly available social media posts. Whether you are posting something on your own blog, web page, social networking, Twitter or similar site or on someone else's, if you mention the Company and also express either a political opinion or an opinion regarding the Company's actions that could pose an actual or potential conflict of interest with the Company, you must include a disclaimer. You should specifically state that the opinion expressed is your personal opinion and not the Company's position. This is necessary to preserve the Company's good will in the marketplace. Similarly, unless you are explicitly authorized to speak on behalf of our Company, make it clear that your views are your own and do not reflect our Company's position. When required by applicable law, disclose your affiliation with our Company. Never use social media to post or communicate about confidential information. Nothing in this section or this Code of Conduct is intended to conflict with any rights contained in the National Labor Relations Act or under state law.

You should protect Company information technology and use it appropriately. Electronic resources are valuable Company assets, and we rely on you to use them appropriately. Hardware, software, e-mail, voicemail, intranet and internet access, computer files and programs are Company property. Where legally permitted, we reserve the right to monitor the use of these resources. You have no legitimate expectation of privacy in regard to your use of Company technology and resources.

You should always protect Company systems from viruses and downtime. Never install unauthorized software, applications, hardware or storage devices on your Company issued computer, and do not access our network through unauthorized applications or devices.

Do not access, store, send, post or publish material that is inappropriate, discriminatory, sexually explicit, offensive or threatening.

For more information, see HR-301: IT User Policy and Procedure and HR-304: IT Information Security Policy.

Intellectual Property

Jadex's intellectual property ("IP") is one of our most valuable assets. IP includes patents, trademarks, copyrights, trade secrets and know-how. You must manage IP with the same degree of care as any other valuable asset. When our IP is not identified or otherwise protected, we risk losing the rights to our property and the competitive advantages it offers. We protect these assets by obtaining patents, trademarks and trade secret protection. Further, we are committed to vigorously protecting these assets and, when appropriate, taking legal action to enforce our IP rights.

It is our policy to not knowingly infringe upon the IP rights of others. Patent infringement, unauthorized copying, trade secret misappropriation and unauthorized disclosure of confidential information of third parties are illegal activities and, if shown, would have serious consequences to Jadex. You are required to report to management or Human Resources, any suggestions or accusations, informal or formal, made by third parties that Jadex has committed any acts of IP infringement as discussed above.

See the Company Confidentiality and Proprietary Rights Agreement for more information.

Safeguard Confidential Information

Information about our Company, such as research and strategies, makes us who we are and drives our competitive advantage in the marketplace. We count on you to preserve and protect our confidential information.

You must protect our Company's confidential information so that it is not used for improper purposes by our competitors or other third parties. Your obligation to protect Jadex's confidential information continues even if you leave our Company. Refer to the Company Confidentiality and Proprietary Rights Agreement.

This paragraph and the Code of Conduct is not intended to preclude or dissuade you from engaging in legally protected activities and/or activities protected by state or federal law, including the National Labor Relations Act, such as discussing wages, benefits, or other terms and conditions of employment, raising complaints about working conditions for your own and your fellow employees' mutual aid or protection, or legally required activities. Accordingly, safeguarding our Company's confidential information does not prevent you from providing information to government authorities regarding possible legal violations, participating in investigations, testifying in proceedings regarding Jadex's past or future conduct, engaging in any future activities protected under the whistleblower statutes administered by any government agency or receiving and retaining a monetary award from a government-administered whistleblower award program for providing information directly to a government agency.

What is confidential information?

- Verbal, written or electronic information that is not generally known to the public, but you are exposed to as part of your job.
- Examples include research and development plans, trade secrets, strategic plans, intellectual property, product designs, technical information, marketing plans, employee lists, and customer lists.
- Some information may be confidential and later become public (e.g., financial results). Such information should be treated confidentially until authorized Company representatives have disclosed the information publicly.

How can I protect confidential information?

- Use it only as necessary to do your job.
- Share it only with (1) employees at our Company who need to know it to do their jobs, and (2) third parties who have signed nondisclosure agreements (e.g., suppliers) or who are subject to professional duties of confidentiality (e.g., attorneys).
- Only allow people with proper authorization into our facilities and contact local security if you notice unauthorized visitors.
- Safeguard confidential documents, including in your office.
- Do not discuss Company business in public places such as elevators, planes and restaurants where others can hear it.
- Do not view confidential information on your laptop in public places where others can see it.
- Refer questions from investors, the media and others to the Jadex Communications Manager.
- Ensure that employees return all confidential information if they leave our Company.

Maintain and Preserve Records

It's important that we keep records for an appropriate length of time. The Jadex Records Retention and Destruction Guidelines suggest minimum record retention periods for certain types of records. These provide helpful guidance, but keep in mind that legal requirements, accounting rules, and other external sources sometimes specify longer retention periods for certain types of records, and those control where applicable. In addition, if asked by Human Resources or Legal to retain records relevant to a litigation, audit, or investigation, do so until Human Resources or Legal tells you retention is no longer necessary. If you have any questions regarding the correct length of time to retain a record, contact your manager or Human Resources.

External Communication on Behalf of the Company

You should not speak on behalf of the Company unless authorized. Only individuals authorized by the Company may communicate the Company's official position. Any requests for information should be directed to Human Resources and Jadex Communications.

- Any form of contact from the media about the state of the business, finances, company procedures, corporate events, leadership etc. that you receive are to be directed to Human Resources and Jadex Communications.
- If you are approached, please say "I am going to direct you to our corporate team to answer your question." And direct them to Human Resources and Jadex Communications.

If you see social media content that you believe should be addressed by the Company, do not respond or address it yourself, rather send the relevant information to Human Resources and Jadex Communications.

Together, we can help ensure Jadex is represented positively, fairly and accurately in media coverage across the world.

Fair and Ethical Dealing

We believe that integrity and trustworthiness build long-lasting relationships. Dealing fairly and honestly with customers, suppliers and other third parties is one of our fundamental business practices. Every employee must promote positive business relationships. Never gain unfair advantage by misleading, misrepresenting or deceiving.

We do not participate in false or deceptive advertising of our products, services or our Company. Make sure that you are truthful and accurate in promotional materials, including advertising,

sales, and marketing communications; and, ensure that you can substantiate any claims that you make.

Buy and sell based only on appropriate business considerations such as quality, price, service, reliability and ethical standards. When purchasing on our Company's behalf, give all potential suppliers equal consideration and treat them fairly and honestly. Never indicate that our relationship with suppliers and other third parties will be affected by personal favors or offers of gifts or entertainment.

Obtain Competitive Information Fairly

Gathering information about our competitors, often called competitive intelligence, is a legitimate business practice; doing so helps us stay competitive in the marketplace. You must never use any illegal or unethical means to get information about other companies. Legitimate sources of competitive information include publicly available information such as news accounts, industry surveys, competitors' displays at conferences and trade shows and information publicly available on the internet. You may also gain competitive information appropriately from customers and suppliers (unless they are prohibited from sharing the information) by obtaining a license to use the information or purchasing ownership of the information. When working with consultants, vendors and other partners ensure that they understand and follow Jadex's policy on gathering competitive information.

Protect the Privacy of Personal Data

We believe that respecting the privacy of our employees, business partners and consumers builds trust and long-lasting relationships.

We may collect or come in contact with the personal data of our Company's employees, business partners or consumers. Personally identifiable information is data that could be used to potentially identify a specific individual. Examples include: date of birth, home address, photo, passport number and social security number. When accessing or handling personally identifiable information (PII), each of us has an obligation to comply with all applicable data privacy and data protection laws.

Maintain Accurate Books and Records

Honesty in our books, records and financial statements is critical to our success and to maintaining the trust of our stockholders and other stakeholders.

Timesheets, purchase orders, expense reports – we count on you to be honest and obtain all necessary authorizations in your transactions. You must be accurate, transparent, prompt and complete when recording your transactions. Only use Company funds for the purpose described in the documents supporting the payment.

We maintain the accuracy and integrity of financial reports

- Follow all internal processes, and the laws, rules and regulations that govern financial accounting and reporting, to accurately record assets, liabilities, revenues and expenses.
- Never intentionally delay recording transactions.
- Be honest when making forecasts and make sure that our records and reports accurately reflect our financial position, as described by the supporting documentation.
- Disclosures we make to government entities and communications to the business or financial community must be full, fair, accurate, timely, and understandable.

We cooperate fully with our internal and external auditors. We are open and honest with auditors, tax authorities, and other regulators. Do not take any action to coerce, manipulate or mislead anyone auditing or reviewing our Company's financial statements.

Anti-Trust and Fair Competition Laws

We embrace a free and open marketplace where we compete vigorously and comply with competition and antitrust laws.

Competition laws exist in virtually every country, and we must comply with these laws. The purpose of competition laws is to protect consumers and companies by preserving free and open competition. The penalties for violating these laws may include high fines, not being able to enforce commercial agreements and even imprisonment.

Our Company must act independently in making certain business decisions. You must not discuss sensitive business information with competitors including pricing, sales terms, marketing plans, trade programs, discounts, boycotts of suppliers/customers/competitors, or proprietary information. Discussing this type of information may give the appearance of cooperating with competitors instead of being independent.

Do not discuss or enter into a formal or informal agreement or understanding with a competitor that relates to any competitive matter including refraining from competing in certain product or geographic markets.

Do not participate in agreements that restrict our buyers' resale prices or terms and conditions of sale without legal advice. In countries where our Company has a particularly strong position, consult with the Legal Department to ensure that actions related to pricing and selling are not in violation of competition laws.

Do not discriminate in the prices, terms and services offered to similarly situated customers purchasing similar goods in like quantities on similar terms. If you are unsure whether a given position is discriminatory in nature, consult with the Legal Department.

No Bribery

Like all businesses, Jadex is subject to lots of laws, both U.S. and non-U.S., that prohibit bribery in virtually every kind of commercial setting. The rule for us at Jadex is simple – don't bribe anybody, anytime, for any reason.

Never accept or provide anything of value, either directly or indirectly, in order to obtain an improper advantage or to obtain or retain business. Regardless of local practice or the practices of other companies, make sure you avoid even the appearance of doing something improper to gain a business advantage. Be particularly cautious when dealing with government or public officials, officials of international organizations, political parties and employees of state-owned or state-controlled enterprises. Do not give anything of value to a government official or employee without obtaining prior authorization from Legal or Human Resources.

Anti-Money Laundering

Money laundering is a global problem with far-reaching and serious consequences. Money laundering is defined as the process of converting illegal proceeds so that funds are made to appear legitimate. Money laundering is not limited to cash transactions. Involvement in such activities undermines our integrity, damages our reputation, and can expose Jadex and individuals to severe

penalties. Jadex forbids knowingly engaging in transactions that facilitate money laundering or result in unlawful diversion. We take affirmative steps to detect and prevent unacceptable or illegal forms of payment and financial transactions. Anti-money laundering laws of the United States and other countries and international organizations require transparency of payments and the identity of all parties to transactions. We are committed to full compliance with anti-money laundering laws throughout the world and will conduct business only with reputable customers involved in legitimate business activities and transactions.

Trade Controls

Trade controls, including import and export laws regulate where and with whom we can do business. We are committed to compliance with the applicable laws, recognizing that violations can significantly impact our operations and reputation.

As a U.S. company we are prohibited from doing business with sanctioned countries and certain individuals or entities. Most countries globally also have their own sanctioned countries and prohibited parties. We are responsible for ensuring that no person or country involved in a transaction is subject to U.S. sanctions or the sanctions of the countries in which we do business. Additionally, we are prohibited from participating in any international boycott that is not sanctioned by the U.S.

If you know or have reason to believe that a customer or business partner intends to improperly resell our products in another country, for example in a country that is subject to sanctions or to a person or entity that is targeted by sanctions measures, immediately notify the Legal Department.

Environmental Laws

We meet or exceed the requirements of all environmental laws and regulations applicable to our operations around the world.

Environmental laws and regulations protect people and the planet, and aid in the preservation of valuable natural resources. It is important to follow these laws and regulations in order to protect against injuries to employees and harmful impacts on our customers and the communities in which we operate.

Violations of environmental laws may result in high fines, expensive and long-term remediation obligations, restrictions on our operations, and even imprisonment. Where local law may be less restrictive than our policies, you should follow our policies.

[Code of Conduct Acknowledgement to Follow]

Last revised October 2020

Code of Conduct Acknowledgement

I acknowledge that the Jadex Inc. Code of Conduct is an outline of principles for individual and business conduct and does not constitute an employment contract. I acknowledge that my employment with Jadex is "at will," meaning that either Jadex or I may terminate the employment relationship at any time, with or without notice, for any reason or no reason. I further acknowledge that it is my responsibility to understand and follow compliance standards and to adhere to the ethical principles outlined in the Code of Conduct.

Employee Name: _____

Employee Signature: _____

Date: _____