



CatchProbe Intelligence Technologies Corporation

Corporate Conduct and Ethics

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Welcome to CatchProbe Corporation,

Our Code of Conduct serves to guide the actions of our employees consistent with our company values.

Just as we dedicate ourselves to keep the world safe from cyber threats, we pledge to do so in the right way — ethically, with integrity, and aligned to the spirit and intent of the law. While markets and industry may change, our unwavering commitment will not.

We are all responsible for upholding our Code of Conduct. Our culture is ultimately a reflection of our behavior — with other CatchProbe Corporation employees, customers, vendors and partners. We play to win and fast will always matter — but never at the expense of our culture and values.

Our expectation is that this Code of Conduct informs every project, team, office, and interaction wherever we operate around the world. This document defines how we think, speak, and act on behalf of CatchProbe Corporation. By adhering to the highest ethical standards, we ensure our success is achieved the right way.

Thank you for your commitment to our exemplary culture of integrity.

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A Culture of Integrity

At CatchProbe Corporation, we adhere to a set of core values and principles that guide every interaction we have and every decision we make. Integrity is at the core of who we are. It is the foundation of our success. For CatchProbe Corporation to continue to prosper, we must not only understand these values and principles, but we also must adopt them and demonstrate them through the integrity and professionalism that we bring to our global work. At CatchProbe Corporation, we are uncompromising in our commitment to integrity. This forms the foundation for how we conduct business and treat others. We communicate clearly, respectfully, and professionally in business; treating employees, customers, independent contractors, consultants, suppliers, partners, distributors, and others fairly. We act as responsible corporate citizens, respecting human rights and managing the impact of our business on the world around us. For the benefit of each other, our communities, and CatchProbe Corporation, you must adhere to the expectations set forth in the Code of Conduct and all other applicable policies and procedures regarding CatchProbe Corporation-related activities.

Our Values

We Achieve Excellence with Speed and Agility

- The seriousness of our mission requires that we achieve excellence in our product and delivery.
- The pace at which cybersecurity threats emerge requires that we act with speed and agility.
- To accomplish this balance, we are deliberate in our actions and decisions and execute with a sense of urgency.
- We never compromise on quality. We Play to Win or Don't Play
- We are laser focused on keeping people safe and protected.
- We are aligned on our winning strategy: we play to win, and we have fun doing it.
- It is through our passion, curiosity, and tenacity that we unite.
- Mediocrity is not in our vocabulary.
- We rise up to face our adversaries together: one team, empowered.

We Innovate Without Fear

- To deliver on our mission, we constantly experiment and innovate.
- We trust and empower each other to take risks.
- We face our failures head on.
- Our failures make us stronger and smarter.
- We create opportunities to realize the future of cutting-edge security.

We Practice Inclusive Candor and Transparency

- We offer and receive feedback in celebration of risk-taking and learning.
- We base our feedback on a foundation of trust and respect, embracing the differences in each other.
- We hold ourselves to a high standard of accountability and communicate openly and clearly about what works and what doesn't.
- Integrity is at the core of who we are. We never cut corners.

We Put the Customer at the Core

- We collaborate across boundaries to prioritize the customer.
- We listen to our customers' needs.
- We value their feedback and center their experience in our design and delivery.
- We provide an exceptional customer experience for every customer, every time.

Your Responsibilities

The Code of Conduct applies to and sets expectations for all employees, as well as non-employee members of the Board of Managers, regarding their CatchProbe Corporation-related activities. The Code of Conduct also applies to independent contractors, consultants, suppliers, partners, distributors, and all others who do business with CatchProbe Corporation. Those that do business with CatchProbe Corporation can establish more restrictive policies but cannot operate under less restrictive policies.

Before acting, you are responsible for seeking guidance on any policies or practices about which you are unclear. If you have any questions on the application of the Code of Conduct, contact the CatchProbe Corporation Ethics and Compliance Office. In addition, you are responsible for reporting any ethical concerns, including potential violations of the Code of Conduct.

You are responsible for reading, understanding, and following the Code of Conduct. Anyone who violates the Code of Conduct is subject to discipline, up to and including termination of employment or other service to CatchProbe Corporation. Anyone who violates the law may also be subject to civil and criminal penalties.

The Code of Conduct affirms the five principles of conduct at CatchProbe Corporation:

• Integrity at Our Core

We support and uphold a set of core values and principles based on integrity. Our integrity is demonstrated in the way we work, every minute of every day, both internally at CatchProbe Corporation and externally with those with whom we interact. We accept our role as a responsible corporate citizen, including upholding equal employment opportunities and supporting diversity and inclusion.

• Integrity with Each Other

We conduct ourselves in a professional manner that shows our respect for our colleagues. We work as a team, supporting each other as we pursue the continued business success of CatchProbe Corporation.

• Integrity in Business Interactions

We demonstrate the highest ethical standards in every business interaction, treating our employees, customers, independent contractors, consultants, suppliers, partners, distributors, and others with fairness, honesty, and respect. We avoid situations where conflicts of interest can interfere, or appear to interfere, with our ability to make sound business decisions that support CatchProbe Corporation goals, principles, and policies.

• Integrity in Business Practices

We adhere to compliance requirements as our standard operating procedure. We uphold the applicable laws and regulations of the countries where we do business, including following guidelines to ensure the safety and lawful collection and use of the personal data that our employees, customers, independent contractors, consultants, suppliers, partners, distributors, and others entrust to us.

• Integrity with Company Assets and Reputation

We recognize and protect the value of the reputation, physical assets, intellectual property, confidential and proprietary information, and trademarks and brands of CatchProbe Corporation.

Asking Questions and Reporting Concerns

To help our company conduct business with uncompromising integrity and professionalism, everyone to whom the Code of Conduct applies has an obligation to report possible violations of law, regulation, the Code of Conduct, and other company guidelines as described below.

Ways to Seek Guidance

Because the Code of Conduct cannot address every situation, you should seek guidance whenever you are unsure about the correct course of action. There are many ways to ask questions about the Code of Conduct:

- You can email your question to the Ethics and Compliance mailbox.
 - You can ask questions or report concerning internal groups who specialize in handling such issues, including Legal, People Success, Internal Audit, Corporate Security, or Information Security.
 - In accordance with the CatchProbe Corporation Open Door Communication Policy, if you are not comfortable raising an issue with your manager, you can raise the matter with your manager's manager or any manager in your direct management chain. Asking Questions and Reporting Concerns
- CODEOFCONDUCT 7 For other work-related concerns, you are encouraged to contact People Services or your People Services representative.

Non-Retaliation Policy

CatchProbe Corporation does not tolerate retaliation against anyone who, in good faith, reports possible violations of law, regulation, the Code of Conduct, or other company guidelines, questions ongoing or proposed conduct, or participates in an internal investigation. Retaliation can include, among other things, material changes to work assignments and/or demoting, transferring, or terminating anyone for raising a question or speaking up in good faith about a possible violation of the Code of Conduct, company policy, or law.

Integrity with Each Other

One of our core values is to work as a team with respect and trust for each other. We strive to uphold open and honest communication and to protect our colleagues from discrimination, harassment, or unsafe practices.

Open and Honest Communication

We value the free flow of thoughts, ideas, questions, and concerns. We encourage you to raise work-related issues or concerns through our established processes as soon as issues or concerns arise. We do not tolerate retaliation against anyone for asking questions or making good faith reports of possible violations of law, regulation, the Code of Conduct, or other company guidelines.

Anti-Harassment

We are committed to providing a workplace free of harassment. We do not tolerate harassment of individuals by managers or co-workers. We must treat everyone with dignity and respect.

Equal Employment Opportunities, Diversity, and Inclusion

Diversity and inclusion are core values at CatchProbe Corporation. We require it in our workforce and expect our independent contractors, consultants, suppliers, partners, distributors, and all others who do business with CatchProbe Corporation to uphold this same value. Creating a sense of belonging for everyone is our belief and defines the environment we strive to provide.

CatchProbe Corporation is an equal employment opportunity employer, and we do not discriminate against employees or applicants on the basis of race, color, religion, sex, national origin, or ancestry. We also do not discriminate on the basis of age, disability, medical condition, or genetic information. And we do not discriminate based on military or veteran status.

CatchProbe Corporation does not discriminate on the basis of pregnancy, marital status, gender, gender expression, gender identity, sexual orientation, or any other status or characteristic protected by applicable laws, regulations, or ordinances.

For employees and applicants with disabilities, we also make reasonable accommodations as required by law.

You must follow these principles in every area of employment, including recruitment, hiring, training, promotion, compensation, benefits, transfer, and social and recreational programs.

Safety

CatchProbe Corporation is committed to providing a safe workplace for employees, independent contractors, consultants, suppliers, partners, distributors, and others on CatchProbe Corporation property.

You must comply with the safety laws, standards, and guidelines that apply to our business.

Workplace Violence

Our commitment to safety is unwavering. At CatchProbe Corporation, we do not allow or tolerate violent behavior. This includes threatening behaviors of any type (whether explicit or implicit), stalking of an individual, or any acts of physical or emotional abuse. Reports of workplace violence are treated seriously, will be investigated, and will result in appropriate action.

Examples of workplace violence include, but are not limited to:

Shoving • Physical attacks • Throwing an object • Destroying property

Communicate Professionally

The way we communicate orally and in writing is a direct expression of our brand. In all our business communications and interactions, be clear, accurate, respectful, and professional. Unprofessional and ambiguous communications can harm CatchProbe Corporation. Even well-intentioned communications can be misinterpreted. Communication examples include email, presentation materials, voicemails, text messages, and instant messaging, as well as content on social media and websites.

Conducting Business with Customers, Suppliers, Distributors, and Others

Our success is based on strong relationships of mutual respect and trust with our customers, suppliers, distributors, and others. To maintain these strong relationships, we treat everyone with whom we deal with fairness, honesty, and respect.

In our marketing and in our interactions with customers and potential customers, we always represent CatchProbe Corporation products and services fairly and accurately.

We expect others with whom we do business, including independent contractors, consultants, suppliers, and distributors, to comply with all applicable laws, regulations, the Code of Conduct, and other company guidelines and to hold their supply chain accountable to these expectations as well.

Independent contractors, consultants, suppliers, distributors, and others who conduct business with CatchProbe Corporation risk termination of their relationship with CatchProbe Corporation for violations of law, regulation, the Code of Conduct, or other company guidelines. When conducting business or engaging with the U.S. Government, CatchProbe Corporation employees or others acting on behalf of CatchProbe Corporation must comply with requirements set out in our Policy on Doing Business with the U.S. Government.

Conflicts of Interest

A conflict of interest occurs when the interests of CatchProbe Corporation are, or have the potential to be, incompatible with your interests. This can include situations where a third party has interests that conflict with CatchProbe Corporation and you receive benefits from or are associated with that third party. Any activities or situations that have the appearance of a conflict of interest with CatchProbe Corporation must be avoided. This includes activities that compete with CatchProbe Corporation or interfere with the proper performance of our duties or responsibilities to CatchProbe Corporation.

Activities involving personal, outside business, or family interests that can impair your ability to make decisions in the best interest of CatchProbe Corporation must be avoided. Use of company information or company assets, except as permitted under CatchProbe Corporation's Acceptable Use Policy, must not occur. You should never use your role or position at CatchProbe for personal gain.

Being a Responsible Corporate Citizen

As a continuous demonstration of our commitment to corporate social responsibility, we actively seek opportunities that allow our employees to participate in the betterment of others through partnerships with responsible organizations in our communities. Each geography may have varying needs, but there is one unwavering constant: the CatchProbe Corporation charitable spirit and enthusiasm for service.

Our generous investments, through combined volunteerism and financial support, are the manifestation of that charitable spirit, as we serve side by side participating in a wide variety of charitable activities. In everything we do, we hold ourselves to the highest standards of ethics expressed around human rights and environmental, health, and safety issues.

We support education and the enhancement of the communities where we live, work, and play, and are a leader in those efforts.

We make business decisions in the context of the short- and long-term impacts to the environment and the community. We stand against human trafficking, forced, debtbonded, indentured, and slave labor. We will not tolerate and we work to prevent any of these practices in our operations and supply chain wherever we do business.

You must conduct yourself and your activities in a manner that upholds our longstanding global reputation for ethical and socially responsible behavior.

Antitrust

The CatchProbe Corporation Antitrust and Competition Policy reflects the practices we must follow to ensure compliance with antitrust and competition laws around the world. While there are nuances in different countries, antitrust laws generally embrace the same basic principles:

- Never agree with competitors to limit competition
- Never abuse a position of industry leadership

Antitrust laws are designed to encourage competition for the benefit of the market and its participants. These laws prohibit restraining trade unreasonably. The CatchProbe Corporation Antitrust and Competition Policy prohibits any agreements with competitors that would limit competition or unreasonably restrain trade. Never discuss the following when dealing with competitors:

- Setting prices or other conditions of sale
- Dividing markets by product, customer, or geography
- Setting production levels

The consequences for violating antitrust laws are extremely serious. Both CatchProbe Corporation and the individual involved could be at risk of substantial criminal penalties.

While there are certain legal exceptions, the CatchProbe Corporation Antitrust and Competition Policy prohibits:

- Participating in specific practices that exclude our competitors
- Punishing a customer who is doing business with a competitor by withholding or threatening to withhold benefits

Follow CatchProbe Corporation pricing and merchandising policies precisely when dealing with distributors and resellers, the CatchProbe Corporation Antitrust and Competition Policy details our antitrust policy and standards. If you have any questions, contact Legal for guidance.

Bribery and Anti-Corruption

CatchProbe Corporation strictly prohibits all forms of bribery. Our policy is to comply with all anti-corruption laws and to accurately reflect all transactions in CatchProbe Corporation books and records.

Offering or accepting bribes and facilitating or participating in corrupt activity of any kind is never permitted. We do not make facilitation payments on behalf of CatchProbe Corporation to any government official, since many countries' laws define facilitation payments as bribes.

CatchProbe Corporation policy also prohibits any third parties, such as customers, independent contractors, consultants, suppliers, partners, distributors, and all others who do business with CatchProbe Corporation, from offering, promising, or paying bribes. If you believe a third party may attempt to offer a bribe in connection with company business, you must never engage that third party.

Integrity in Business Activities

As a global company, CatchProbe Corporation must comply with the laws of the many countries in which it does business. We are each responsible for knowing and following all applicable laws or regulations.

We also must act in a manner that upholds the spirit and the intent of the law.

Some of the legal topics we encounter include antitrust, anti-corruption, import/export, intellectual property, conflicts of interest, privacy, public communications, and doing business with a government entity.

Always follow the higher standard when the Code of Conduct or company guidelines differ from local laws or regulations. If you believe the requirements of the Code of Conduct conflict with local law, consult Legal. Violations of laws and regulations may have serious consequences for CatchProbe Corporation and for the individuals involved. When questions arise on these or other legal matters, you should always seek guidance from Legal.

Insider Trading

Insider trading occurs when someone trades or otherwise executes transactions in a company's securities or recommends that someone else trade or otherwise execute transactions in a company's securities, while being aware of material, non-public information about that company. Insider trading also occurs when someone discloses material, non-public information about a company to another person who may trade or otherwise execute transactions in that company's securities because of that information.

Material, non-public information is information about a company that is not generally known to the public and that a reasonable investor might find significant in purchasing or selling the company's securities. Anyone who is aware of material, non-public information about any other company must not trade or otherwise execute transactions in that company's securities, disclose that information to others who may trade or otherwise execute transactions in such securities because of that information, or otherwise use that information for personal advantage or the personal advantage of others.

The United States and many other countries have laws that prohibit insider trading.

Preparing Accurate Financial and Other Records

The business decisions we make are based on our financial and business records. It is our responsibility to ensure that CatchProbe Corporation books and records are full, fair, accurate, timely, and understandable reflections of the company's operations and business activities.

Contractual arrangements, time cards, and expense reports, as well as any other records required in the course of our work, must be accurate, complete, and properly authorized. If questions arise, ask a manager for assistance. If you discover records that may be inaccurate, immediately report it to Finance or Legal. Falsification of records under any circumstances will not be tolerated.

We endeavor to conduct business and keep records consistent with relevant accounting standards, and we hire auditors to help us confirm we have done so. All employees and those acting under our direction are required to cooperate with our auditors.

Intellectual Property

New innovations and product developments are the core of our business and require protection. We legally protect the intellectual property we develop while also respecting the rights of others over their intellectual property.

You may not copy, reproduce, or transmit protected material, such as writing, artwork, music, video, photographs, movie clips, and software unless you have authorization or a license to do so.

Examples of things you must not do include, without limitation, the following:

- Copy protected material without permission
- Reproduce protected artwork without permission
- Disclose confidential information to any requestor without a non-disclosure agreement
- Share confidential information with others after leaving CatchProbe Corporation
- Use protected music on an internal video without permission
- Send unlicensed photographs to our marketing agency
- Use movie clips in a product presentation and not for a “fair use” purpose
- Encourage a colleague to use externally obtained confidential information without permission
- Pirate a software program for a team member

Privacy and Security

We each have a responsibility to comply with our privacy and security policies, including requirements for Information Security and Privacy Office reviews of most new products and upgrades, new vendors, and personal data transfers outside of CatchProbe Corporation. We also have a responsibility to comply with the privacy laws of the countries in which we do business.

We are committed to protecting personal data. We honor the legal rights of our employees and customers to control the use of their personal data.

Consult Legal with questions.

External Communications

Only authorized employees and approved spokespeople may make any public statements on behalf of CatchProbe Corporation to the media or investors.

If you are contacted by a reporter, blogger, analyst, or the public requesting comments on behalf of CatchProbe Corporation on a topic for which you are not expressly authorized by Marketing and Communications and the Senior Vice President of your business group to speak on behalf of the company, do not respond. Immediately refer the inquiry to Communications and Legal.

Integrity with Company Assets

We dedicate considerable resources to develop and maintain assets used for the company's business. We each have a responsibility to comply with all policies and procedures that protect the value of CatchProbe Corporation assets. This includes physical and electronic assets and the CatchProbe Corporation brand, name, and reputation. We must also protect confidential information that employees, customers, independent contractors, consultants, suppliers, partners, distributors, and others have entrusted to us.

Protecting Physical Assets

Our physical assets include facilities, equipment, and computer and communications systems. You are to use these assets primarily for our business. As a narrow exception, you may use computer and communications systems for reasonable personal use.

You are required to protect our physical assets from theft, loss, damage, and misuse, which includes allowing an unauthorized person access to them. Deliberate or accidental damage or loss of CatchProbe Corporation property must be reported to Information Security immediately. Stay informed about and follow applicable security and use policies and procedures precisely.

While we respect your privacy, CatchProbe Corporation desks, cubicles, offices, computing devices, and telephone equipment are not private. CatchProbe Corporation reserves the right to monitor individual access and use of CatchProbe Corporation data, information systems, email, and resources, including monitoring of content and usage analysis patterns for both voice and data communication. Reviewing private emails may be subject to restrictions or regulations in some jurisdictions.

Protecting Confidential Information

Confidential information is valuable to CatchProbe Corporation. It gives CatchProbe Corporation a competitive advantage, helps maintain the trust of our customers, and sustains the solid reputation on which CatchProbe Corporation was built. It is important to understand what confidential information is so you can protect it. Protection means preventing its disclosure in any form to any unauthorized party.

You are required to protect CatchProbe Corporation employees', customers', and business partners' confidential information. "Confidential information" means any information, in any format (paper or electronic), that is not in the public domain or generally known outside CatchProbe Corporation.

Examples of confidential information include, but are not limited to:

- The company's business and financial condition
- Strategic and business plans
- Pricing information
- Marketing plans and business development strategies
- Personnel files
- Research and technical data, inventions, and innovations
- Confidential information entrusted by business partners

CatchProbe Corporation expects you to protect and not to disclose confidential information about or belonging to third parties, including, but not limited to, the information of our customers, suppliers, partners, or distributors or others who do business with CatchProbe Corporation. Any violation of contractual terms or law related to a third party's confidentiality rights is subject to discipline, up to and including termination of employment or other service to CatchProbe Corporation, as well as possible legal action.

Safeguarding Trademarks and Brands

Our trademarks and brands represent some of our most valuable assets, and protection is vital to maintain that value and their continued recognition in the marketplace. Our established guidelines help you determine when and how to use them. Regardless of the type of communication, to whom it is directed internally or externally, or whether it is developed by CatchProbe Corporation or by third parties such as marketing agencies, channel distributors, or OEMs, our Brand Identity Guidelines must be followed.