



Code of Conduct and Ethics

2025
Version 1.7

Policy Statement

Ondaro Wave LLC (“Ondaro”) is committed to conducting its business fairly, honestly, and ethically. This Code of Conduct and Ethics outlines our commitment to preventing a breach in ethics in all forms, whether involving government or non-government clients. All collaborators are expected to uphold this commitment and adhere to the principles outlined in this Code of Conduct and Ethics.

Scope

This policy applies to all collaborators, contractors, subcontractors, vendors and suppliers (“third party”) and anyone acting on behalf of Ondaro regardless of their position or location.

Code of Conduct and Ethics

We often tell our collaborators to “do the right thing”. This policy provides some guidance regarding ethical conduct which Ondaro expects from all collaborators and how to do the “right thing.” It is important to understand that this policy is intended to provide general guidance and expectations but is not able to cover every possible situation. The overall takeaway is, if you see something, say something; we all have a responsibility to ensure Ondaro operates in an ethical manner.

The Code also promotes our Core Values, which are the foundation of our organization and what we expect from all collaborators:

INTEGRITY FIRST - Honesty and transparency in all that we do.

CLIENT-OBSSESSED - Our clients’ success is our success.

CONTINUOUSLY CURIOUS - We continually learn and grow.

DEEP ACCOUNTABILITY - We take ownership of our actions and outcomes.

TEAM WITH EMPATHY - Every voice is heard and valued

Build Trust and Credibility

The success of our business is dependent on the trust and confidence we earn from our collaborators and clients. We gain credibility by adhering to our commitments, displaying honesty and integrity and reaching company goals solely through honorable conduct. It is our differentiated value in the Marketplace in front of our clients and competitors. It is easy to say what we must do, but the proof is in our actions. Ultimately, we will be judged on what we do.

Respect for the Individual



We all deserve to work in an environment where we are treated with dignity and respect. Ondaro is committed to creating such an environment because it brings out the full potential in each of us, which, in turn, contributes directly to our business success. We cannot afford to let anyone's talents go to waste.

Ondaro is an equal employment/affirmative action employer and is committed to providing a "safe workplace environment" that is free of discrimination of all types from abusive, offensive or harassing behavior. Any collaborator who feels harassed or discriminated against should promptly report the incident to their manager or to People Operations.

Create a Culture of Open and Honest Communication

At Ondaro everyone should feel comfortable to speak their mind, particularly with respect to ethics concerns. Managers have a responsibility to create an open and supportive environment where collaborators feel comfortable raising such questions. We all benefit tremendously when collaborators exercise their power to prevent mistakes or wrongdoing by asking the right questions at the right times.

Ondaro will investigate all reported instances of questionable or unethical behavior. In every instance where improper behavior is found to have occurred, the company will take appropriate action. We will not tolerate retaliation against collaborators who raise genuine ethics concerns in good faith and will keep the highest standard of confidentiality throughout the process, as needed.

Ethics and Compliance Program

(See [GA-0027 Ethics and Compliance Program Policy](#) for full information on our culture of compliance).

Ondaro is committed to maintaining the highest standards of integrity, ethical behavior, and compliance with all applicable laws and regulations. The company has developed a comprehensive Ethics and Compliance Program and has an Ethics and Compliance Officer to ensure that all collaborators, contractors, subcontractors, vendors and suppliers (third party) understand and adhere to these standards as well as feel empowered to raise their concerns.

Whistleblower Protection

(See [GA-0031 Whistleblower Protection Policy](#) for full information on reporting and our intolerance for retaliation).

A whistleblower, as defined by the Whistleblower Protection Policy, is a collaborator of Ondaro who reports suspected unethical behavior, violations of company policies, or illegal or dishonest activities to one or more of the parties specified in this Policy. The whistleblower is not responsible for investigating the activity or for determining fault or corrective measures; appropriate management officials are charged with these responsibilities.

Examples of illegal or dishonest activities are violations of federal, state or local laws; billing for services not performed or for goods not delivered; and other fraudulent financial reporting.

If a collaborator has knowledge of or a concern of illegal or dishonest fraudulent activity, the collaborator is to contact their manager, the Ethics and Compliance Officer or report the matter through the NAVEX – EthicsPoint Hotline. collaborators must exercise sound judgment to avoid baseless allegations. A collaborator who intentionally files a false report of wrongdoing will be subject to corrective action up to and including termination.



Whistleblower protections are provided in two important areas -- confidentiality and against retaliation. To the extent possible, the confidentiality of the whistleblower will be maintained. However, identity may have to be disclosed to conduct a thorough investigation, if required by or to comply with the law and to provide accused individuals their legal rights of defense. The Company will not retaliate against a whistleblower. This includes, but is not limited to, protection from retaliation in the form of an adverse employment action such as termination, compensation decreases, or poor work assignments and threats of physical harm. Any whistleblower who believes they are being retaliated against must contact the People Department or the Ethics and Compliance Officer immediately. The right of a whistleblower for protection against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated.

The Defend Trade Secrets Act (DTSA) provides the following definitions of compliance: "Immunity from Liability for Confidential Disclosure of a Trade Secret to the Government or in a Court Filing:

(1) Immunity — An individual shall not be held criminally or civilly liable under any federal or state trade secret law for the disclosure of a trade secret that—(A) is made—(i) in confidence to a federal, state or local government official, either directly or indirectly, or to an attorney; and (ii) solely for the purpose of reporting or investigating a suspected violation of law; or (B) is made in a complaint or other document filed in a lawsuit or other proceeding, if such filing is made under seal.

(2) Use of Trade Secret Information in Anti-Retaliation Lawsuit — An individual who files a lawsuit for retaliation by an employer for reporting a suspected violation of law may disclose the trade secret to the attorney of the individual and use the trade secret information in the court proceeding, if the individual— (A) files any document containing the trade secret under seal; and (B) does not disclose the trade secret, except pursuant to court order."

All reports of illegal and dishonest activities will be promptly submitted to the Ethics and Compliance Officer who are responsible for investigating and coordinating corrective action.

collaborators are encouraged to address such issues with their manager, People Department or the Ethics and Compliance Officer. If for any reason that is not possible, a collaborators is not comfortable raising the issue with their manager, they should promptly report the concern to the Ethics and Compliance Officer or use the ethics hotline (NAVEX – EthicsPoint Hotline).

Set Tone at the Top

Management has the added responsibility for demonstrating, through their actions, the importance of this Code. In any business, ethical behavior does not simply happen; it is the product of clear and direct communication of behavioral expectations, modeled from the top, consistent in all cases, and demonstrated by example. Again, ultimately, our actions are what matters.

To make our Code work, managers must be responsible for promptly addressing ethical questions or concerns raised by collaborators and for taking the appropriate steps to deal with such issues and escalate them accordingly. Managers should not consider collaborators ethics concerns as threats or challenges to their authority, but rather as another encouraged form of business communication. At Ondaro we want the ethics dialogue to become a natural part of daily work.



Uphold the Law

Ondaro's commitment to integrity begins with complying with laws, rules and regulations where we do business. Further, each of us must have an understanding of the company policies, laws, rules and regulations that apply to our specific roles. If we are unsure of whether a contemplated action is permitted by law or Ondaro policy, we should seek the advice from the internal resource expert. We are responsible for preventing violations of law and for speaking up if we see possible violations.

Competition

We are dedicated to ethical, fair and vigorous competition. We will sell Ondaro's services based on their merit, superior quality, functionality and competitive pricing. We will make independent pricing and marketing decisions and will not improperly cooperate or coordinate our activities with our competitors. We will not offer or solicit improper payments or gratuities in connection with the purchase of goods or services for Ondaro or the sales of its services, nor will we engage or assist in unlawful boycotts of particular customers. Every collaborator directly or indirectly involved in the business development of Ondaro maintains a responsibility to uphold such standards and to behave fairly and ethically at all times, including when competing for business. Competition and antitrust laws prohibit anti-competitive behavior such as conspiring with others to fix prices or agreeing with competitors not to compete in certain regions or on particular contract opportunities.

Proprietary Information

It is important that we respect the property rights of others. We will not acquire or seek to acquire improper means of a competitor's trade secrets or other proprietary or confidential information. We will not engage in unauthorized use, copying, distribution or alteration of software or other intellectual property.

Selective Disclosure

We will not selectively disclose (whether in one-on-one or small discussions, meetings, presentations, proposals or otherwise) any material nonpublic information with respect to Ondaro, its securities, business operations, plans, financial condition, results of operations or any development plan. We should be particularly vigilant when making presentations or proposals to customers to ensure that our presentations do not contain material nonpublic information.

Exports and Import Laws

Certain products and services we provide may be subject to export and import control laws such as those governing strategically important technologies and products. Violation of such controls can harm national security and foreign policy. Therefore, it is critical to ensure compliance with all applicable regulations that govern our export and import activities. Export and import controls govern the transfer of certain controlled tangible products, technical data, software source-code, as well as the provision of services ("controlled items"). Export restrictions may apply whenever controlled items are provided to, or accessible by, a foreign entity or person. This includes access to or disclosure to foreign persons in the United States. Controlled items may be provided physically or materially; orally in conversation or by telephone; electronically by e-mail or fax; or by other means. Every export of a controlled item



requires some form of government authorization; such authorizations include exemptions, licenses or agreements. All collaborators involved in international operations must be familiar with and at all times adhere to internal policies and procedures governing the management of controlled technology and/or services. Failure to do so could expose the company and yourself to potential fines, criminal prosecution and loss of privileges. Involvement in international operations may include submitting a proposal to a foreign government customer; co-developing with collaborators from different subsidiaries or affiliated entities operating in different countries; transmitting technical information to a supplier in another country; or initiating contact with a foreign or dual national inside a company facility or at a trade show. We do not expect every collaborator to be an expert in the complex area of export and import regulations. However, you must be accountable for understanding that export and import control laws may apply to you based on your involvement in international operations. If you are uncertain of the specific regulations that may apply to you, please contact and seek advice from your manager and the Ethics and Compliance Officer.

Political Procedures

Ondaro respects the integrity of the political process and is committed to upholding the laws that govern our participation. Many countries, including the United States, prohibit corporations from donating corporate funds, goods or services directly or indirectly to political candidates at the federal level. This includes employees' work time. Local laws may apply as well.

We are also committed to ensuring that all lobbying activities are conducted in strict compliance with applicable regulatory, legal, procedural, and company policies. To ensure legal compliance as well as coordination of our political activities, before making a political contribution or any political or lobbying contact, initiative or communication on behalf of the company, please contact the Ethics and Compliance Officer.

Voluntary collaborator involvement in the political process is encouraged but must be conducted on your own time and without the use of any company resources. If you plan to seek or accept public office, you must first contact the Ethics and Compliance Officer to consult with Ondaro's legal team.

Selection of Third Parties

The actions of our consultants, technical advisors, sales representatives and any other third parties or affiliates we interact with will reflect upon and impact Ondaro. We will only work with consultants and business representatives of known integrity and require that their conduct meet our standards.

Collaborators involved in engaging or overseeing third parties must comply with all Ondaro policies and procedures regarding third-party selection, approval, due diligence and appropriate monitoring. Third parties must never be engaged for improper or illegal purposes such as paying bribes or kickbacks, engaging in industrial espionage, or obtaining the proprietary information of others.

We demand that our business representatives and advisors comply with our policies. If you are ever aware of any possible violations of these policies by any third party you must promptly report it to management, the Ethics and Compliance Officer or Ondaro's legal team.

Zero Tolerance for Corruption and Bribery



(See [GA-0025 Anti-Bribery and Anti-Corruption Policy](#) for full information about this policy).

Our reputation for honesty is far more important than any new business opportunity. We will not engage in bribery or any other type of corruption, whether involving public officials or private individuals – even if that means not winning new business.

All countries in which we have operations and/or are pursuing new business, including the United States have passed laws criminalizing bribery of government officials. These laws apply to all collaborators around the world.

The sanctions for violating these laws can be severe, including significant corporate fines, suspension, debarment, adverse publicity and a destroyed corporate reputation.

For collaborators who engage in bribery or other such illegal conduct, those sanctions can include individual fines, loss of employment and imprisonment.

We must never offer, attempt to offer, authorize or promise any sort of bribe, payment or kickback to a government official or private party for the purpose of obtaining or retaining business or an improper advantage. Likewise, we must never solicit or accept a bribe or kickback from a public official or private party. A bribe includes any payment, benefit or gift offered, promised or given with the purpose of influencing a decision or outcome.

Ondaro also prohibits “facilitation payments,” which are small sums paid to foreign government officials to expedite or facilitate nondiscretionary actions or services, such as obtaining an ordinary license or government service. We must never hire someone else (e.g., a sales representative, consultant, or reseller) to do anything that we cannot ethically or legally do ourselves. Ondaro and our collaborators can be held liable for bribes paid by a third-party agent or consultant acting on Ondaro’s behalf.

We will use reasonable diligence in vetting the legitimacy of business dealings with customers and partners. We will not be party to any likely or known illegal or fraudulent transactions or business dealings.

All collaborators who interact with current or potential customers have an obligation to understand and comply with all company policies and applicable laws pertaining to anti-bribery and anti-corruption. Ondaro provides training and resources on these standards; however, when in doubt, consult management and the Ethics and Compliance Officer.

Avoid Conflicts of Interests

Conflict of Interest

(See [GA-0026 Conflict of Interest Policy](#) for full information about this policy).

We must avoid any relationship or activity that might impair, or even appear to impair, our ability to make objective and fair decisions when performing our jobs. At times, we may be faced with situations where the business actions we take on behalf of Ondaro may conflict with our own personal or family interests. We owe a duty to Ondaro to advance its legitimate interests when the opportunity to do so arises. We must never use Ondaro property or information for personal gain or personally take for ourselves any opportunity that is discovered through our position with Ondaro.



Here are some other ways in which conflicts of interest could arise:

1. Being employed (you or a close family member) by, or acting as a consultant to, a competitor or potential competitor, supplier or contractor, regardless of the nature of the employment, while you are employed with Ondaro.
2. Hiring or supervising family members or closely related people.
3. Serving as a board member for an outside commercial company or organization.
4. Owning or having a substantial interest in a competitor, supplier or contractor.
5. Having a personal interest, financial interest or potential gain in any Ondaro transaction.
6. Placing company business with a firm owned or controlled by a collaborator or their family.
7. Accepting gifts, discounts, favors or services from a customer/potential customer, competitor or supplier, unless equally available to all collaborators.

Determining whether a conflict of interest exists is not always easy to do. Collaborators with a conflict of interest should seek advice from management. Before engaging in any activity, transaction or relationship that might give rise to a conflict of interest, collaborators must seek review from their manager, the People Department and Ethics and Compliance Officer.

Gifts, Gratuities and Business Courtesies

(See [GA-0028 Gifts and Gratuities Policy](#) for full information about this policy.)

Offering Business Courtesies and Gifts Generally

Ondaro competes on the merits of its products and services and does not use the exchange of business courtesies to gain an unfair competitive advantage. Giving and receiving business courtesy is only permitted when doing so is legal, in compliance with all applicable Ondaro and customer policies and does not create the impression that it is given to influence business judgment.

Any collaborator who offers, or approves the offer of, a business courtesy must ensure that it is proper and cannot reasonably be interpreted as an attempt to gain an unfair business advantage or otherwise adversely impact the reputation of, or embarrass, Ondaro or the recipient. Solicitation of business courtesies is always prohibited, and a collaborator may never use personal funds or resources to do something that cannot be done in compliance with internal policy or law with Ondaro resources.

Business Courtesies, Gifts, and Public Officials

Government employees in the U.S. and other countries are subject to varied and complex rules¹ that often prohibit them from accepting any items of value, including gifts or business courtesies offered as a thank you for past actions and gifts offered for acts that a public official would perform regardless of being offered a gift. In return, federal employees are prohibited from accepting a gift offered by an organization, if the offering organization performs or seeks to perform any business with the agency. However, there are limited circumstances that may permit providing

¹ Including without limitation, the Foreign Corrupt Practices Act, the California Political Reform Act, California Penal Code Section 67 and 85, 5 CFR § 2635.201-206, Cal. Gov. Code § 89503, 2 CCR § 18940.2, the Ethics in Government Act of 1978, 5 U.S.C. § 13109, Executive Order 12674 (as modified by Executive Order 12731), 5 CFR Part 2634, Subpart I, 5 U.S.C. app. § 102, etc.



a gift to a public official. Because you may not be aware of all government contracts that Ondaro maintains or is attempting to secure, collaborators must obtain pre-approval from management or the Ethics and Compliance Officer before offering any gift or business courtesy to a government employee or an elected official of any nation. However, at no time may such gift or business courtesy exceed applicable reporting and restriction thresholds for state and local officials², federal government employees³, executive branch employees⁴, or otherwise then in effect.

Business Courtesies, Gifts, and Risks of Kickbacks and Favorable Treatment

In certain contexts, a gift or business courtesy may be interpreted as an unlawful “Kickback.” It is essential for collaborators to understand what constitutes a “Kickback” to avoid any involvement in or allegations of unethical behavior. The term “Kickback” may include, without limitation, any:

- Money (including gift cards);
- Fees;
- Commissions;
- Credits;
- Gifts or gratuities;
- Compensation of any kind; or
- Items or services of value, including tickets to fine arts or sporting events

If these items or services are provided to:

- A prime contractor or an employee of that prime contractor; or
- A subcontractor or an employee of that subcontractor

... with the intent to improperly obtain or reward “Favorable Treatment” in connection with a prime contract or a subcontract.

“Favorable Treatment” is interpreted very broadly and extends beyond the mere act of awarding a contract and/or ensuring continued work for a bidder. collaborators should be aware that Favorable Treatment may also include, without limitation, actions such as:

- Disclosure or receipt of confidential information relating to competitor bids;
- Knowingly accepting or providing inferior products that do not meet contract specifications;
- Placement on a bidder’s list without meeting the required qualifications;
- Removal of a qualified competitor from a bidder’s list; or
- Adding or recovering unallowable or improper expenses.

These actions, if intended to benefit a bidder or influence a procurement decision, may be considered unlawful Kickbacks. Thus, it is important for collaborators to obtain pre-approval from management or the Ethics and

² As of June 2024, pursuant to Cal. Gov. Code § 89503 and 2 CCR § 18940.2, state and local officials and employees are generally prohibited from receiving a gift or business courtesy totaling more than \$590 in a calendar year from a single source.

³ As of June 2024, pursuant to 5 CFR § 2635.201-206, federal government employees are prohibited from directly or indirectly soliciting or accepting gifts, unless an exception applies including unsolicited gifts valued at \$20 or less per source per occasion (5 CFR § 2635.204(a)).

⁴ As of June 2024, pursuant to 5 U.S.C. § 13109, Executive Order 12674 (as modified by Executive Order 12731), 5 CFR Part 2634, Subpart I, and 5 U.S.C. app. § 102, certain executive branch employees are required to report gifts or business courtesies totaling more than \$480 from a single source during the applicable reporting period.



Compliance Officer before offering any gift or business courtesy to a third party which Ondaro services or intends to service in connection with a prime contract or subcontract.

Business Courtesies, Gifts, and Commercial Parties

collaborators may provide non-monetary business courtesies or gifts to our commercial customers, provided such gifts are not “Kickbacks” or likely to be considered “Kickbacks.” Further, management may approve reimbursements for other business courtesies, tangible or intangible items such as meals, drinks, entertainment, recreation, transportation, discounts, promotional items, or entertainment of reasonable value, provided that:

- The practice does not violate any law or regulation or the standards of conduct of the recipient’s organization;
- The business courtesy is consistent with industry practice and aligned to a business case and the company strategy, is infrequent in nature, is not lavish;
- The business must use the Business Invitation Request Form to obtain approval for any business courtesy case. The form is submitted to the Ethics and Compliance officer, and;
- The business courtesy is properly reflected on the book and records of Ondaro.

Accepting Gifts and Business Courtesies

Most gifts and business courtesies offered to us in the course of our employment are offered because of our positions at Ondaro. We should not feel any entitlement to accept and keep a gift or business courtesy. Although we must not use our position at Ondaro to obtain gifts or business courtesies, and we must never ask for them, we may accept unsolicited gifts or business courtesies that promote successful working relationships and good will with the firms that Ondaro maintains or may establish a business relationship with, provided that all gifts and business courtesies accepted, valued at \$150 or greater from a single source in an individual instance, are reported to the People Department on a monthly basis.

Collaborators who award contracts or who can influence the allocation of business, who create specifications that result in the placement of business or who participate in negotiation of contracts must be particularly careful to avoid actions that create the appearance of favoritism or that may adversely affect the company’s reputation for impartiality and fair dealing. The prudent course of action is to refuse courtesies from a supplier when Ondaro is involved in choosing or reconfirming a supplier or when accepting courtesies may create an impression that offering courtesies is necessary to obtain business with Ondaro.

Meals, Refreshments and Entertainment

We may accept occasional meals, refreshments, entertainment and similar business courtesies that are shared with the person who has offered to pay for the meal or entertainment, provided that:

- They are not inappropriately lavish or excessive;
- The courtesies are not frequent and do not reflect a pattern of frequent acceptance of courtesies from the same person or entity;
- The courtesy does not create the appearance of an attempt to influence business decisions, such as accepting courtesies or entertainment from a supplier whose contract is expiring in the near future;



- The collaborator accepting the business courtesy would not feel uncomfortable discussing the courtesy with their manager or colleague or having the courtesies known by the public; and
- The collaborator should report all meals, refreshments, entertainment and similar business courtesies accepted, valued at \$150 or greater from a single source in an individual instance, to the Ethics and Compliance Officer.

Set Metrics, and Report Results Accurately

Accurate Public Disclosures

We will make certain that all disclosures made in financial reports and public documents are full, fair, accurate, timely and understandable. This obligation applies to all collaborators, including all financial executives, with any responsibility for the preparation for such reports, including drafting, reviewing and signing or certifying the information contained therein. No business goal of any kind is ever an excuse for misrepresenting facts or falsifying records.

Collaborators should inform Executive Leadership and the Ethics and Compliance Officer if they learn that information in any filing or public communication was untrue or misleading at the time it was made or if subsequent information would affect a similar future filing or public communication.

Document Retention Policy

(See [GA-0018 Document Retention Policy](#) for full information about this policy.)

We create, retain and dispose of our company records as part of our normal course of business in compliance with all Ondaro's policies and guidelines, as well as all regulatory and legal requirements.

All corporate records must be true, accurate and complete, and company data must be promptly and accurately entered in our books in accordance with Ondaro's and other applicable accounting principles.

We must not improperly influence, manipulate or mislead any unauthorized audit, nor interfere with any auditor engaged to perform an internal independent audit of Ondaro books, records, processes or internal controls.

Accurate Timekeeping

Employees who charge their work time to commercial projects or in support of a government contract, i.e. "direct charge" employees, are personally responsible for ensuring that their hours worked are accurate and charged to the correct project number(s). This means maintaining an accurate, daily record of time spent by project; working in accordance with applicable work plans; and certifying the accuracy of your timesheet on a weekly or biweekly basis, as directed. Time charging violations damage customer trust and can subject Ondaro and its employees to substantial fines and penalties.

Promote Substance Over Form



At times, we are all faced with decisions we would rather not have to make and issues we would prefer to avoid. Sometimes, we hope that if we avoid confronting a problem, it will simply go away.

At Ondaro, we must have the courage to tackle the tough decisions and make difficult choices, secure in the knowledge that Ondaro is committed to doing the right thing. At times this will mean doing more than simply what the law requires. Merely because we can pursue a course of action does not mean we should do so.

Although Ondar's guiding principles cannot address every issue or provide answers to every dilemma, they can define the spirit in which we intend to do business and should guide us in our daily conduct.

Accountability

Each of us is responsible for knowing and adhering to the values and standards set forth in this Code and for raising questions if we are uncertain about company policy. If we are concerned whether the standards are being met or are aware of violations of the Code, we must contact the Ethics and Compliance Officer.

Ondaro takes seriously the standards set forth in the Code, and violations are cause for corrective action up to and including termination of employment.

Confidential and Proprietary Information

Integral to Ondaro's business success is our protection of confidential company information, as well as nonpublic information entrusted to us by collaborators, customers and other business partners. Confidential and proprietary information includes such things as pricing and financial data, customer names/addresses or nonpublic information about other companies, including current or potential suppliers and vendors. We will not disclose confidential and nonpublic information without a valid business purpose and proper authorization. Notwithstanding anything herein to the contrary, pursuant to FAR 52.203-19, collaborators are authorized to lawfully report waste, fraud or abuse related to the performance of any government contract to a designated investigative or law enforcement representative or a federal department or agency authorized to receive such information including, without limitation, the Office of the Inspector General.

Use of Company Resources

Company resources, including time, material, equipment and information, are provided for company business use. Nonetheless, occasional personal use is permissible as long as it does not affect job performance or cause a disruption to the workplace.

Collaborators and those who represent Ondaro are trusted to behave responsibly and use good judgment to conserve company resources. Managers are responsible for the resources assigned to their departments and are empowered to resolve issues concerning their proper use.

Generally, we will not use company equipment such as computers, cell phone, copiers and fax machines in the conduct of an outside business or in support of any religious, political or other outside daily activity, except for company-requested support to nonprofit organizations. We will not solicit contributions nor distribute non-work-related materials during work hours.



In order to protect the interests of the Ondaro network and our collaborators, Ondaro reserves the right to monitor or review all data and information contained on a collaborators' company-issued computer, electronic devices, the use of the Internet or Ondaro's intranet. We will not tolerate the use of company resources to create, access, store, print, solicit or send any materials that are harassing, threatening, abusive, sexually explicit or otherwise offensive or inappropriate.

Questions about the proper use of company resources should be directed to your manager.

Media Inquiries

Ondaro is a high-profile company in our community, and from time to time, collaborators may be approached by reporters and other members of the media. To ensure that we speak with one voice and provide accurate information about the company, we should direct all media inquiries to Marketing (inbound@Cask NX.com). No one may issue a press release without first consulting with the Strategic Marketing Department.

Comentado [CG1]: Pending confirmation from Marketing Director, Elysa.

Do the Right Thing

Several key questions can help identify situations that may be unethical, inappropriate or illegal. Ask yourself:

- Does what I am doing comply with the Ondaro values, Code of Conduct and company policies?
- Have I been asked to misrepresent information or deviate from normal procedure?
- Would I feel comfortable describing my decision at a staff meeting or in front of a government authority?
- How would it look if it made the headlines?
- Am I being loyal to my family, my company and myself?
- What would I tell my child to do?
- Is this the right thing to do?

Reporting Procedures

collaborators must report any suspected or actual incidents of violation to Ondaro's Code of Conduct immediately to their manager, the People Department, Ethics and Compliance Officer or use NAVEX – EthicsPoint Hotline. Please refer to the Red Flag reporting line section. All reports will be thoroughly investigated, keeping confidentiality and appropriate disciplinary action will be taken against those found in violation of this policy.

Ondaro wants and needs collaborators and others who work with us to promptly report possible legal and ethical violations. Ondaro does not permit or tolerate retaliation against anyone for raising a good-faith concern or participating in an investigation. Retaliation can take many forms – overt and subtle – including adverse employment actions, threats, harassment, ostracism, deprivation of career opportunities and similar conduct.

Ondaro will not tolerate retaliation for making reports in good faith, so if you see misconduct, do the right thing and speak up.

NAVEX - EthicsPoint Hotline



Ondaro is committed to an environment where open, honest communications are the expectation, not the exception. We want you to feel comfortable in escalating situations and instances where you believe violations of policies or standards have occurred.

If you are uncomfortable with a situation and wish to report a concern anonymously, NAVEX – EthicsPoint Hotline is available 24/7 to help you do so safely, securely, and confidentially.

NAVEX – EthicsPoint Hotline is your confidential hotline for reporting:

- Fraudulent activity or theft
- Misconduct
- Safety violations
- Unethical or inappropriate behavior

To file a report, pick one of the following options:

Call: 1-833-718-5740

Text: 1-858-437-3446

Email: ethics-compliance@caskllc.com

Web Intake Site: caskinc.ethicspoint.com

Mobile Intake Site: caskincmobile.ethicspoint.com

Compliance Hub: caskinc.navexone.com/peoplehub

Once you submit your report, you'll receive a unique "report key". Write down your report key and password and keep them in a safe place. After 24 to 48 hours, use your report key and password to check your report for feedback or questions.

EthicsPoint is not a 911 or Emergency Service. Do not use this site to report events presenting an immediate threat to life or property. Reports submitted through this service may not receive an immediate response. If you require emergency assistance, please contact your local authorities.

Training and Awareness

(See [GA-0030 Training and Awareness Policy](#) for full information about this policy.)

Regular training programs on complying with the Code of Conduct and Business Ethics will be provided to all collaborators to ensure understanding and compliance.

Consequences of Non-Compliance

Non-compliance with this policy may result in disciplinary action, up to and including termination of employment, as defined in the Employees Handbook.

Additional Information and Resources

Contact the Ethics and Compliance at todd.feder@ondarowave.com or People Department at sabrina.morin@ondarowave.com if you have questions about this policy.

Comentado [CG2]: Pending update. The process with Navex is underway.



Revisions

Version	Date	Author	Change/Comment
1.0	January 16, 2020	Brian Peters	Initial Policy
1.1.	February 8, 2023	Claudia Anguiano	Format Update
1.2	March 10, 2024	Dana Parrish	Addition of RedFlag Reporting, Format Update, Reporting, and Training addition
1.3	June 25, 2024	Cask NX Legal	Addition of restrictions on Offering and Accepting Gifts and Business Courtesies, Timekeeping, Export and Import restrictions, Confidentiality exceptions, and adherence to the Political Process.
1.4	January 1, 2025	Heather Kelly	Addition of policy details, Core Values Edit.
1.5	February 4, 2025	Andrea Mon	Additional details and revision regarding reporting channels
1.6	July 14, 2025	Ethics and Compliance Officer and Compliance Associate	Overall Update
1.7	October, 2025	Ethics and Compliance Officer and Compliance Associate I Todd Feder and Camila Garcés	Branding Update to "Ondaro", content, and third-party naming convention