



A MESSAGE FROM OUR CHIEF EXECUTIVE OFFICER

At Real Chemistry, we are committed to the success of our employees, clients and the health care providers and patients we serve. Our mission “to use AI and ideas to transform what health care is into what it should be” is embedded into our culture and serves as a guidepost for every action we take. We take this responsibility seriously and recognize the tremendous amount of trust that our clients have placed in our ability to deliver services, technology, and insights to improve patient experiences and health outcomes.

Our commitment to client success goes hand-in-hand with our culture of inclusivity, respect, teamwork, accountability and integrity. These are our values that are embodied in the decisions and actions that each of us undertake every single day. Our people, clients and values are critical to Real Chemistry’s long-term success.

Our Code of Business Conduct and Ethics (the “Code”) ensures that we hold ourselves and how we do business to a high standard. The Code sets requirements for business conduct and serves as a foundation for our Company policies, procedures, and guidelines, all of which provide additional guidance on expected behaviors. All of us are responsible for protecting Real Chemistry’s name, and we must strive to do the right thing in every instance. Most of the time, the right conduct is obvious, but in some situations, it is not. We expect you to embrace the Code’s principles and encourage you to apply your common sense and good judgment to help us operate our business ethically and with integrity.

If you are ever unsure or feel that the Code is being violated, we ask you to speak up. Talk to your manager, a member of the human resources department and/or the legal department so that the situation can be assessed. You may also share concerns anonymously through our Speak Up Hotline reporting system. Remember, our non-retaliation policy means that you don’t need to be afraid of asking questions or reporting potential issues. Failing to comply with the Code could put you, your colleagues, and Real Chemistry at risk, and accordingly, could result in disciplinary action and even dismissal.

We are proud to lead a company that is committed to high ethical business practices and providing a great work environment for our employees, delivering outstanding service to our clients, and developing commercial, clinical, and corporate solutions that put people at the core, through data, proprietary technology, and powerful creativity. I remind you to familiarize yourself with the Code and use it as your guide. To reach our goals, we all must remain vigilant that our words and actions reflect our commitment to observing the highest standards of ethical business conduct and conducting business in accordance with all applicable laws, rules, and regulations.

Sincerely,

A handwritten signature in black ink, appearing to read "Shankar Narayanan".

Shankar Narayanan
Chief Executive Officer

INTRODUCTION

Real Chemistry is committed to observing the highest standards of ethical business conduct and conducting business in accordance with all applicable laws, rules, and regulations. All employees of The WeissComm Group Ltd. and its subsidiaries and affiliated companies (collectively, “Real Chemistry” or the “Company”) must abide by this Code of Business Conduct and Ethics (the “Code”). We also expect Real Chemistry’s contractors and consultants to abide by our Code in connection with their work for Real Chemistry.

MISSION & VISION

Our mission is to use AI and ideas to transform what health care is into what it should be. We improve health outcomes and access to healthcare by providing bold thinking and creative solutions to reimagine health care. For more than 20 years we have built a home where the best health experts collaborate and innovate to deliver services, technologies and insights that put people and powerful creativity at the core. Our success will help to realize our vision for every human to have the opportunity of an excellent health care experience.

CORE VALUES



BEST TOGETHER

As individuals, we are among the best in our fields. But, as a company, we complement each other’s strengths like an all-star team. Here, inclusion and collaboration aren’t just words but at the core of who we want and need to be - in a world where diversity of people, perspectives and expertise is critical to solving the whole of health care’s greatest challenges - rather than some of its parts.



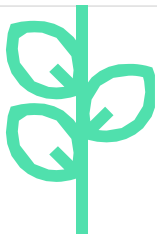
IMPACT OBSESSED

We see health care’s challenges as solutions waiting to happen. By deeply understanding our clients’ business, our audience’s lives and the barriers that stand in their way – we are ever-prepared and always driven to positively impact companies, care and the world. Challenging ourselves to break conventions for better results, as opposed to blindly following the status quo. Because we have the power to change lives, as well as an industry. And we refuse to waste it.



EXCELLENCE EXPECTED

This is more than a job. Or just a company. We built Real Chemistry to be a place where people can accelerate their careers and be better than they were before - through big, meaningful challenges, increased exposure and an entrepreneurial environment. Our standards and expectations are high (as they should be). But so is our level of commitment to developing everyone who walks through our doors, virtual or otherwise, to be at their best. Because we can’t create excellent health care experiences without being excellent ourselves.



EVOLVE, ALWAYS

As health care modernizes, the only constant is change. To lead that change, we embrace the need to evolve as a company and as people. Phrases like, “This is the way things have always been done” and “It is what it is” don’t fly here. We believe in the art of uncovering (and leaning into) opportunities to change and get better, even when it’s uncomfortable. Demanding ourselves to be the difference between what health care is and what it should be.



ACCOUNTABILITY WITH AN “I”

There is no “we” in accountability. It is a value every single one of us owns individually. I am accountable to my team, my clients, my company. I am measured by and rewarded for my actions and results, rather than tenure or entitlement. I do what’s right not what’s easy, operate with integrity and respect, and strive to stand up for what I believe and assume my role in the health of our business. I am accountable. And so are you.

1. COMPLIANCE WITH LAW

We expect our management team to encourage and promote compliance with the laws, rules, and regulations applicable to our business and operations. All representatives of the Company must respect and obey the laws of the jurisdictions in which we operate. This includes laws prohibiting bribery, corruption, or the conduct of business with specified individuals, companies, or countries. It is the personal responsibility of each employee to adhere to the standards and restrictions imposed by those laws, rules and regulations.

You are required to complete all mandatory trainings that have been assigned to you in a timely manner, in order to familiarize yourself with the laws, rules and regulations that apply to both you and the Company. It is also important that you seek advice from supervisors, managers or other appropriate personnel if you have questions regarding the laws, rules and regulations that apply to the Company's business.

2. CONFLICTS OF INTEREST

Real Chemistry's reputation for trust and integrity is its most valuable asset and this is directly related and impacted by the conduct of its employees. As a Real Chemistry employee, you are expected to conduct yourself in the best interest of Real Chemistry and therefore, should avoid situations where your private activities or relationships conflict, or appear to conflict, with Real Chemistry's interests.

You must disclose any interest, relationship or activity that may conflict with, or appear to conflict with Real Chemistry's interests. You may be required to cease any conflicting behavior as a term of your employment.

Conflicts of interest can arise from a variety of situations, including (but not limited) to the following:

- Financial interests in vendors, suppliers, competitors, or clients
 - Business or investment opportunities offered based on your role at Real Chemistry
 - Indicating Real Chemistry's support for a specific civic, religious, or political association
 - Favoring a vendor, supplier, client, or business partner for personal reasons
- In endeavoring to avoid any actual or potential conflicts of interest between your personal and professional relationships, you should be aware of, and comply with, the following policies as well as other policies in the Code, including those pertaining to gifts and entertainment and company opportunities. You should contact your manager if you are aware of any potential conflict of interest or have questions or concerns that need further clarification.
- ### **Outside Work**
- Employees are prohibited from participating in outside employment, self-employment, or service as an officer, director, partner or consultant for outside organizations (regardless of whether or not you are personally being compensated for your participation) if such activity:
- Interferes with your ability to fully and satisfactorily meet the requirements of your position with Real Chemistry
 - Interferes with your ability to act conscientiously in the Company's best interest
 - Requires you to utilize the Company's proprietary or confidential procedures, plans or techniques
- Without limiting the generality of the foregoing, you are prohibited from working for, or conducting any outside business with our competitors.
- Employees are required to obtain approval from both the legal department and human resources department of any outside employment or consulting engagement, including the name of the company and expected work hours.
- Private activities that compete with Real Chemistry's interests

3. COMPETITION & FAIR DEALING

We are committed to business success through maintenance of high standards of responsibility and ethics and seek to outperform our competition fairly and honestly. You should endeavor to respect the rights of and deal fairly with our clients, suppliers, competitors and employees. You should not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair-dealing practice. If you receive, or otherwise come to possess, our or another organization's confidential information by mistake, report it to the legal department immediately.

Federal and state laws prohibit unfair methods of competition and unfair or deceptive acts and practices. These laws are designed to protect both competitors and consumers. All public statements by or on behalf of the Company, including in connection with advertising, promotional materials, sales representations, warranties and guarantees, should always be truthful and have a reasonable basis in fact and should not be misleading or purposefully made easily susceptible of misinterpretation. Comparisons of our products or services with the products or services of competitors should be accurate and should be made only where facts support the statements and conclusions drawn.

4. COMPANY OPPORTUNITIES

You are prohibited from taking, for yourself personally, opportunities that are discovered through your use of Company property, information, or position. You may not use our property, information or position for improper personal gain, and you may not compete with the Company directly or indirectly. You owe a duty to us to advance our legitimate business interests when the opportunity arises.

5. PROTECTION & PROPER USE OF COMPANY ASSETS

You should protect our assets (including, but not limited to, our technology, trademarks, brand, facilities, hardware, software, and products) and ensure their efficient use. Theft, carelessness and waste have a direct impact on our profitability. All Company assets should be used for legitimate business purposes.

Company email, internet, phones and computers should be used for business purposes only, and you should have no expectation of privacy when using Company provided services or equipment.

6. ANTI-BRIBERY & ANTI-CORRUPTION

Real Chemistry is committed to conducting business in a legal and ethical way. Therefore, we comply with all applicable anti-bribery laws and expect the same of our employees and third-party associates. Although exchanging courtesies in the form of minor gifts or meals may promote goodwill, it is important to acknowledge that misunderstandings can occur, especially when such an exchange occurs during or near the negotiation of a business deal.

Therefore, it is critical that nothing of value is ever offered, promised, or given (directly or indirectly) in order to influence or obligate the recipient to reciprocate with a benefit for Real Chemistry. Such behavior is strictly prohibited. The acceptance of such questionable gifts can expose Real Chemistry to legal risk. In such an occasion, employees should politely decline any such offer and promptly inform management of the entire incident.

Employees must not solicit, accept, or give anything of value that could create the appearance that they or Real Chemistry are being influenced or are influencing another into doing business.

Red flags to watch out for include, but are not limited to:

- Requests or demands for bribes
- Unexpected gifts of a material nature (i.e., beyond typical "conference swag")
- Requests to make charitable donations as a condition of doing business
- Requests for employment as a condition of doing business
- Requests from a supplier to make payments on the supplier's behalf to someone else
- Strong suggestions that a particular individual, firm, or supplier be hired before negotiations can resume
- Requests for unusual or excessive payments
- Requests for an unusually high commission
- Failure to provide standard or accurate invoices
- Unusual bonuses

If you interact with government officials on Real Chemistry's behalf, be particularly careful about gifts, meals, and entertainment, please be aware that laws and regulations governing what companies like Real Chemistry can give government officials are very strict.

Real Chemistry is committed to observing the standards of conduct set forth in the United States Foreign Corrupt Practices Act and the applicable anti-corruption laws of the countries in which we operate. Accordingly, Real Chemistry prohibits giving anything of value to any governmental official (including employees of companies in which a government has an ownership interest) without first consulting with

the legal department. The foregoing does not apply to lawful personal political contributions.

You should always check with the legal department with questions about whether entertainment events or other expenses for government officials are permissible. The policy prohibiting questionable payments applies to direct actions of Real Chemistry employees and indirect actions by representatives, business partners, or third parties acting on the company's behalf. We must also know our business partners and be aware of any affiliations with governmental officials. This will involve our legal department reviewing contracts and ensuring that we know our business partners and are comfortable with the way they do business.

7. GIFTS & ENTERTAINMENT

We believe that good relationships are important to our business. Reasonable business entertainment and gifts are often customary and foster goodwill with our clients and vendors. However, excessive entertainment or gifts may pose, or create the appearance of posing, a conflict of interest, improper influence or the appearance of bribery. Additionally, it can erode the confidence and trust of others in your business decisions.

You should not accept any entertainment or gift that may place you under any obligation or impair your judgment in instances where our best interests are at stake. This prohibition applies even if the entertainment or gift is otherwise reasonable or customary. Without limiting the generality of the foregoing, we believe that the following create the appearance of impropriety and you and your family members are therefore specifically prohibited from offering, giving or accepting any gift or entertainment that:

- Is a cash gift
- Is inconsistent with customary business practices,
- Is excessive in terms of frequency or value
- Can be construed as a bribe or payoff
- Violates any laws or regulations

You should discuss any questionable gift or entertainment with our Chief Legal Officer or General Counsel.

Gifts, promotional items and entertainment may be extended at our expense in the normal course of business provided the items:

- Are reasonable in nature, frequency and amount
- Are consistent with applicable law as well as with accepted ethical standards and business practices
- Have been authorized, are properly recorded, and are of sufficiently limited value so that they will not be construed as a bribe, payoff or kickback

- Would not embarrass the Company should public disclosure be made

Business entertainment must be moderately scaled and clearly intended to create goodwill among business partners. As a general guideline, business entertainment in the form of meals and beverages is acceptable as long as it is not lavish and does not become routine.

What is acceptable practice in the commercial business environment may be illegal or against the policies of federal, state or local governments. Therefore, no gifts or business entertainment of any kind may be given to any government employee without the prior approval of both your supervisor and the Company's Chief Legal Officer or General Counsel.

8. CONFIDENTIALITY

You will learn, work with, and be entrusted with, confidential information relating to our operations and our clients. You must maintain the confidentiality of confidential information entrusted to you. Confidential information includes all non-public information that, if disclosed, might be useful to competitors, or harmful to us or our clients.

Specific examples of information that is confidential include financial information; costs; business projections; business and marketing plans; product architecture; source code; designs; databases; client lists; pricing strategies; personnel data; personally identifiable information pertaining to our employees, clients, or other individuals; and similar types of information provided to us by our clients, suppliers, and partners.

Keeping this information confidential is necessary to ensure our success. Because this information has substantial value to us, you must exercise care not to disclose any confidential information even inadvertently (for example, through

conversation in elevators or restaurants), to any unauthorized person in or outside the Company.

Failure to maintain the confidentiality of information entrusted to the Company, particularly confidential client information, could seriously damage our reputation and business.

9. INTELLECTUAL PROPERTY

Real Chemistry creates and develops concepts, strategies and plans for our clients or for use internally in our operations. In all cases, the ideas (intellectual property) and the materials developed by Real Chemistry employees remains the property of Real Chemistry and its clients. All documents and other materials prepared for clients during the course of business, including, but not limited to, plans, letters and reports, and any copies thereof, are the property of Real Chemistry.

Real Chemistry competes fairly. Accordingly, you may not possess or use non-public information belonging to another company without the permission of that company. This prohibition includes information from competitors and former employers.

To protect yourself and the Company, don't accept confidential information from other companies without first having all parties sign an appropriate nondisclosure agreement approved by the Company's legal department. Should you unintentionally come into possession of a third party's confidential information, contact a member of the legal department immediately.

10. PRIVACY

In the course of conducting business, we collect and store personal information about employees, business partners, patients, healthcare professionals, clients and others, such as addresses, birth dates and financial, medical and other information. When we collect and process personal information, we must comply with applicable laws and Company

privacy policies.

Personal information should be collected only for legitimate business purposes, shared only with those who are permitted access, protected in accordance with security policies and retained only for as long as necessary. We also must ensure that third parties with access to personal information are contractually obligated to protect it in accordance with applicable data security standards.

Real Chemistry takes the data privacy of our clients, partners, and patients extremely seriously. We have a responsibility under data privacy laws, regulations, and our contracts to protect private and confidential information that is entrusted to us.

It is your responsibility to familiarize yourself with the legal and contractual responsibilities that are applicable to client, partner and patient data to which you have access, and to comply with those responsibilities.

11. RECORD KEEPING & ACCOUNTING

We require honest and accurate recording and reporting of information in order to make responsible business decisions and plan for the future.

For example, only the true and actual number of hours worked can be reported. Your business expenses must be authorized and accurately documented and submitted in accordance with the Company's travel and expense policy. Your supervisor should be consulted if you are not sure whether a certain expense is legitimate.

All quarterly, annual and other financial reports must be consistently prepared in accordance with U.S. Generally Accepted Accounting Principles (GAAP). All statutory filings in non-U.S. locations must comply with the accounting requirements of those countries and all other applicable country regulations.

All books and records of the Company are required by law to be kept so that they fully and fairly reflect all our receipts and expenditures. In furtherance of this policy, the following shall apply:

- Misleading entries or intentional omissions to Company official documentation are absolutely prohibited. Each employee has a responsibility to ensure that any information that is recorded is accurate and complete.
- No numbered or secret account or undisclosed or unrecorded funds or asset of the Company shall be maintained or established for any purpose
- No false or artificial entries shall be made on our books and records for any reason and you shall not engage in any arrangement that results in such prohibited act
- No transaction shall be effected, and no payment shall be approved or made, on behalf of the Company with the intention or understanding that any part of such payment is to be used for any purpose other than that described by the documents supporting the payment.

The Foreign Corrupt Practices Act requires us to keep detailed books, records and accounts accurately reflecting corporate payments and transactions. The Act also requires us to institute and maintain internal accounting control systems that would assure management's control over our assets. Criminal and civil penalties applicable to the bribery portions of the law may also apply to infractions of the record-keeping and accounting sections.

It is our policy to address all concerns regarding our financial statements and our accounting, internal accounting controls or audit matters. If you have complaints or concerns regarding questionable accounting or auditing matters, you should promptly report the matter to our Chief Financial Officer, Chief Legal Officer and/or General Counsel. If you wish to submit these concerns or complaints anonymously, you can do so as described below under "Duty to Report Illegal or Unethical Behavior and Code Violations". If desired, you may also submit

concerns or complaints anonymously through our SpeakUp Hotline reporting system.

12. TIME AND EXPENSE REPORTING

Expenses and hours worked must be reported accurately and in a timely manner. This applies to both client billable and internal charge hours, including the over-reporting and under-reporting of hours worked, and any expenses reported to the Company. The Company has an obligation to accurately bill clients for fees and expenses, in accordance with engagement terms and conditions. Accordingly, all personnel must properly report hours worked and expenses incurred in our time and expense reporting systems, in accordance with Company policies, and allocate such charges to the appropriate charge codes.

For tracking purposes, non-billable hours that cannot be billed or expensed to a client must still be recorded to the appropriate non-billable code (e.g. pitches for new business, staff development, networking, etc.). In reporting expenses, individuals certify that they are legitimate and proper business expenses in accordance with Company policy.

The intentional submission of false time or expense reports is considered serious misconduct, at a minimum, but could also constitute theft and/or fraud.

13. INSIDER TRADING

There are instances where Company employees may have confidential "inside" information about Real Chemistry or its affiliates, or about client or about another company with which we do business that is not known to the investing public. Employees must maintain the confidentiality of such information. If a reasonable investor would consider this information important in reaching an investment decision, the employee with this information must not buy or sell securities of any of the companies in question or give this information to another person who trades in such

securities. This rule is very important, and the Company has adopted the [Insider Trading Policy](#).

14. RECORD RETENTION

Our corporate records are important assets. Corporate records include essentially everything you produce as an employee including electronic records. This may be something as obvious as a memorandum, a contract or a product or market study or something not as obvious, such as a desk calendar, an appointment book, an e-mail, or an expense record.

Real Chemistry prohibits any employee or director from altering, destroying, mutilating or concealing a record, document, or other object, or attempt to do so, with the intent to impair the object's integrity or availability for use in an official proceeding.

We are required by law to maintain certain types of corporate records, usually for a specified period of time. Failure to retain such documents for such minimum periods could subject us to penalties and fines, cause the loss of rights, obstruct justice, place us in contempt of court or place us at a serious and/or unnecessary disadvantage in litigation.

Accordingly, we have established our [Corporate Records and Destruction Policy](#) to assure retention for required periods and timely destruction of retrievable records, such as hard copies and records on computers, or electronic systems. Even if a document is retained for the minimum period, legal liability or other adverse effects could still result if a document is destroyed before its scheduled destruction date.

You are expected to fully comply with the records retention/destruction policy for the department in which you work, as it may be implemented from time to time. If you believe that documents should be saved beyond the applicable retention period, you should consult a supervisor who, in turn, should contact the company's Chief Legal Officer or General Counsel.

15. WORK ENVIRONMENT

We strive to maintain a healthy, safe and productive work environment. We will not tolerate comments or conduct in the workplace that creates, encourages or permits an offensive, intimidating or inappropriate work environment.

We prohibit on our premises violence and threats of any kind against our employees, the possession or use of weapons, and illicit drug or excessive alcohol use.

We are committed to providing a work environment that strives to protect employee health and safety. At the same time, health and safety are important aspects of job performance. You have a responsibility to learn the safety procedures applicable to your job and to follow them.

16. DIVERSITY AND INCLUSION

Creating an inclusive, equitable, and diverse environment is key to our success as a business. We are committed to promoting diversity and inclusion both inside and outside of the office. An inclusive and diverse work environment promotes respect and understanding, fosters creativity and innovation, and is a competitive business advantage.

Our Company provides equal opportunities for employment. We base employment decisions on merit, considering qualifications and achievement. We strictly prohibit discrimination based on race, creed, color, religion, sex, gender, age, national origin, alienage or citizenship status, sexual orientation, gender identity or expression, marital, partnership or familial status, disability, genetic information, veteran/military status, domestic violence victim status, or any other characteristic protected by law.

17. EQUAL OPPORTUNITY, ANTI-HARASSMENT & ANTI-DISCRIMINATION

We seek to maintain our reputation as an outstanding employer and to ensure high levels of employee motivation and commitment. Our policy is to treat applicants and employees without regard to age, race, creed, color, religion, national origin, gender, sexual orientation, gender identity or expression, physical or mental disability, or any other legally protected classification; and to provide challenging opportunities for individual growth and advancement free of discrimination and harassment.

Real Chemistry is deeply committed to maintaining a safe working environment that is free from any type of discrimination and/or harassment.

This includes any inappropriate conduct or comment by an individual towards another that they knew or reasonably ought to have known would cause the other person to be humiliated, embarrassed, and/or intimidated.

Some examples of prohibited behavior include, but are not limited to:

- Verbal or written conduct such as epithets, derogatory remarks, slurs, or sexual advances, invitations, or inappropriate comments
- Visual conduct such as derogatory or sexually-oriented posters, photography, cartoons, drawings, emails, or gestures
- Physical conduct such as assault, unwanted touching, intentionally blocking normal movement, interfering with work because of sex, race, or other protected status
- Threats or demands to submit to sexual requests as a condition of continued employment, or to avoid some other loss
- Explicit or implied offers of employment benefits in return for favors

If you believe that you have been subjected to any Anti-Harassment and Anti-Discrimination policy, form of harassment that is prohibited by this you should report it immediately to a member of the human resources department and/or the legal department.

18 ANTITRUST LAWS

The federal government, most state governments, the European Economic Community, and many foreign governments have enacted antitrust or "competition" laws. These laws deal with agreements and practices "in restraint of trade," such as price fixing and boycotting suppliers or clients. They also bar pricing intended to run a competitor out of business; disparaging, misrepresenting, or harassing a competitor; stealing trade secrets; bribery; and kickbacks.

As with all applicable laws, it is Real Chemistry's policy to comply scrupulously with antitrust laws. Moreover, antitrust laws are vigorously enforced. Violations may result in severe penalties against the Company. There may also be sanctions against individual employees.

19. SOCIAL MEDIA

We embrace social media as an important tool of corporate and business engagement and encourage our employees to use social media in a personal capacity as a way to reach out and share with friends and communities. We trust and expect you to use your best judgment and exercise personal responsibility whenever you participate in social media or other online activities.

Unless you have received authorization from the marketing department, you should not represent or suggest in any social media content that you are authorized to speak on our behalf, or that we have reviewed and approved your content.

Any non-business use of social media during work hours should be incidental, occasional, and reasonable, and should not interfere with your work commitments.

We prohibit any conduct that adversely affects your job performance or the performance of fellow employees, or otherwise adversely affects our clients, suppliers, business partners or our legitimate business interests.

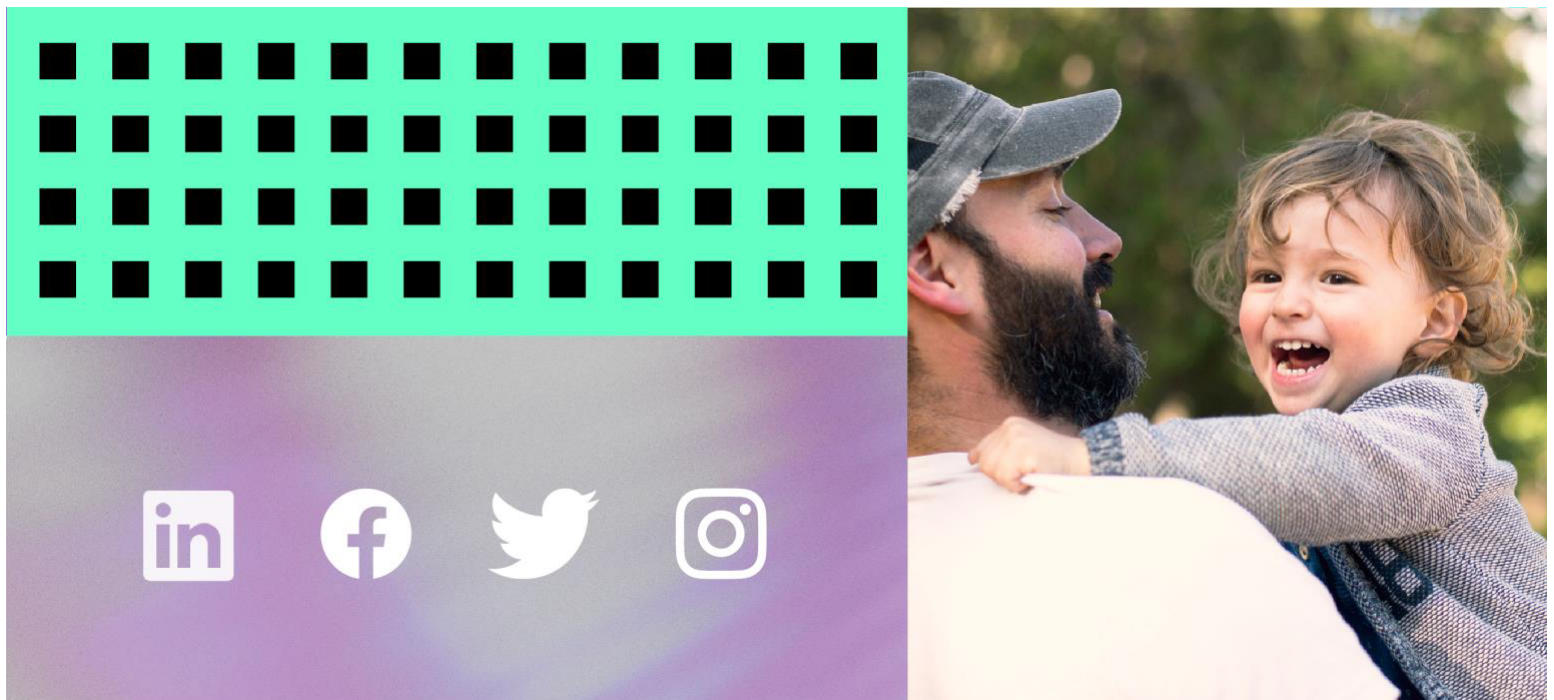
We will not tolerate inappropriate postings that include discriminatory remarks, harassment, violence, or similar unlawful conduct.

Never disclose confidential information online such as our trade secrets; internal reports, policies, or procedures; identifiable information of individual employees, contractors, clients, actual or prospective clients, business partners, or suppliers; business performance; financial forecasts or other material nonpublic information.

If you would like to post to social media about Real Chemistry, please use Dynamic Signal for pre-approved messaging. Dynamic Signal can be found on Okta.

If you would like to post to social media about any Client or internal initiative, remember to disclose your connection to the initiative, such as #Client #IWorkedOnThis or something similar.

If you become aware that our technologies and electronic communications are being used inappropriately, or that social media use is in violation of our policy, notify your manager or a member of the legal department.



20. COMPLIANCE PROCEDURES

Everyone at the Company must work to ensure prompt and consistent action against violations of this Code. Since it's impossible to anticipate every situation that will arise, it is important to have a way to approach a new question or problem. These are the steps to keep in mind:

Make sure you have all the facts

In order to reach the right solutions, it is important to be as fully informed as possible.

Clarify your responsibility and role

In many situations, there is shared information and responsibility. Ask yourself: "Are my colleagues informed?" It may help to discuss the problem with those with whom you share responsibility.

Discuss the problem with your supervisors

This is the basic guidance for all situations. In many cases, your supervisor will be more knowledgeable about the issue, and he or she will appreciate being brought into the process.

Remember that it is your supervisor's responsibility to help solve problems. If the supervisor cannot help or is part of the problem, the matter can be discussed with the next higher level of supervision or even higher, if necessary. You are also encouraged to seek assistance directly from a Human Resources representative or a member of the Company's legal department on any matter.

Ask yourself: "What specifically am I being asked to do?" "Does it seem unethical or improper?"

This will enable you to focus on the specific question that is presented, and on the alternatives that you have. Use your judgment and common sense; if something seems unethical or improper, it probably is.

Utilize the Company's "open door" policy

In the rare case where it may not be appropriate to discuss an issue with your supervisor or where you do not feel comfortable approaching your supervisor about the issue, remember that we maintain an "open door" policy. The "open door" policy allows you to raise the matter to higher levels of management, including in the Chief People Officer, General Counsel, Chief Legal Officer, Chief Financial Officer and the Chief Executive Officer.

Report confidentially and anonymously

If you feel uncomfortable presenting any concern, problem or complaint in person, you may present your concern anonymously as described below under "Duty to Report Illegal or Unethical Behavior and Code Violations."



Above all, it is important to speak up promptly so that matters can be addressed. You will not be retaliated against for raising what you believe to be a genuine issue or concern.

21. DUTY TO REPORT ILLEGAL OR UNETHICAL BEHAVIOR & CODE VIOLATIONS

All of our employees, consultants and representatives must understand and comply with this Code. Violations of the Code will not be tolerated and will result in (a) discipline for employees, up to and including termination of employment, and (b) other appropriate consequences for non-employees.

You are responsible for reporting any circumstances that you believe in good faith may constitute a violation of the Code. You are also responsible for reporting what you believe may be violations of other laws and policies, such as those dealing with environmental protection, quality assurance, occupational safety or

securities fraud. If you know of, or reasonably believe there is, a violation of applicable laws, the Code or our related policies and procedures, you must report that information immediately to your manager, supervisor or the human resources department. Doing so is not an act of disloyalty. It is an action that shows a sense of responsibility and fairness to your fellow employees, as well as our clients and investors.

Reports made to spread falsehoods or threaten others, or with the intent to damage another person's reputation, violate our Code and may lead to disciplinary action, up to and including termination of employment.

ANONYMOUS REPORTING

You are encouraged to talk to your supervisors or other appropriate personnel about observed illegal or unethical behavior or violations of this Code, or, if you are in doubt about the best course of action in a particular situation. In addition, you are expected to cooperate in internal investigations of misconduct.

Real Chemistry has selected a third-party compliance website, SpeakUp Hotline to provide you with a simple, risk-free way to confidentially (and, at your choice, anonymously) report actual or suspected activities that may involve financial misconduct or violations of the Code. This webpage is hosted on secure servers and is not part of Real Chemistry's website or intranet.

For convenience, we have included a link to the reporting system that can be found on the on the Oka homepage called "RC Speak Up".

You can file a report through the SpeakUp Hotline either over web or phone. For more details:



You can use the SpeakUp Hotline icon that is listed on RC's MyApps platform: <https://myapps.microsoft.com/>

INVESTIGATION OF COMPLAINTS

The matters covered in this Code are of the utmost importance to Real Chemistry, its investors and its business partners, and are essential to the Company's ability to conduct its business in accordance with its stated values.

All reports of alleged violations under this Code will be promptly and thoroughly investigated, and all information disclosed during the course of the investigation will remain confidential, except as necessary to conduct the investigation and take any remedial action, or as required by applicable law. If, at the conclusion of our investigation, it is determined that a violation of this Code has occurred, we will take prompt remedial action commensurate with the severity of the offense. This action may include disciplinary action against the accused party, up to and including termination of employment.

Reasonable and necessary steps will also be taken to prevent any further violations of the policy at issue. Where laws have been violated, Real Chemistry will cooperate fully with the appropriate authorities. Where the Company has suffered a loss, it may pursue its remedies against the individuals or entities responsible.



All employees have a duty to cooperate in investigations of misconduct. Failure to cooperate will result in disciplinary action, up to and including termination of employment

22. PROHIBITION AGAINST RETALIATION

We prohibit retaliation against any employee who in good faith provides any information or otherwise assists in any investigation or proceeding regarding any matters of legal or regulatory concern, or violations of this Code. If you feel that you are being subjected to retaliation, you are urged to immediately inform the human resources department or follow the procedures described in the "Compliance Procedures" and/or "Duty to Report Illegal or Unethical Behavior & Code Violations" sections set forth in this Code.

All complaints of retaliation will be investigated

stop and remedy any such conduct. Any person found in violation of this policy is subject to disciplinary action, including discharge.

23. CONSEQUENCES FOR NON-ADHERENCE TO CODE PROVISIONS

You shall be personally responsible and accountable for your adherence to the provisions of this Code. We may impose such sanctions, including dismissal for cause for employees and other appropriate consequences for non-employees, for violations of this Code as we shall determine, under the circumstances, to be in the best interests of the Company.