

Code of Conduct Introduction

Astreya Partners is committed to excellence in all that we do as well as how we do it. As we continue to grow, we want to be proud not only of our achievements, but also of how we achieve success. To that end, Astreya's *Code of Conduct* is intended to help us make good decisions on the job every day and is built around the recognition that everything we do in connection with our work will be measured against the highest possible standards of ethical business conduct.

Astreya's *Code of Conduct* summarizes the principles and policies that we use to guide our conduct. It does not replace the Employee Handbook and Company Policies and Procedures, nor does it attempt to anticipate every ethical dilemma that you might face during your career or association with Astreya. Instead, it offers general guidance on certain issues to assist you in maintaining Astreya's high standards for personal and corporate behavior.

We recognize that situations involving ethics can be complicated, and sometimes it is difficult to know what to do. Our culture is built on good decisions made through open and honest discussion with others, so you should never feel alone when facing an ethical dilemma and always feel encouraged to approach your manager, a member of the Human Resources Department, or an executive team member with a concern. We want you to have the resources you need to make good choices on the job every day within the framework provided by the *Astreya Code of Conduct*.

Additionally, with customers around the globe, Astreya recognizes that we must also navigate the complexities of global legal and regulatory requirements. Our policies may sometimes differ from local laws, rules, cultural norms, and regulations. Where there appears to be a conflict, you should typically comply with the more restrictive requirement. However, if a cultural norm violates our core values or if the right course of action is not clear, contact your manager, a member of the Human Resources Department, or an executive team member for guidance.

Astreya's Code of Conduct applies to everyone, including executives, board members, directors, officers, employees, contractors, and anyone temporarily assigned to perform work for Astreya. Our continued success depends on each and every one of us consistently doing what is right. Not only do we expect you to understand Astreya's *Code of Conduct*, but we also expect you to follow its spirit and letter. Astreya counts on everyone on our team to use good judgment and ask questions whenever there is doubt about what to do.

Introduction to Workplace Harassment Training

Astreya is built on a foundation of integrity, trust, and respect that drives us to value and embrace differences. We are committed to creating and fostering a work environment that promotes integrity and we seek to create a culture where employees feel safe and valued. We believe that we have a collective responsibility to ensure all of our employees, independent contractors, vendors and other third parties with whom an employee comes into contact are treated fairly, with respect, and have an equal opportunity to enjoy a safe and productive work environment. Accordingly, Astreya is dedicated to providing a work environment free of inappropriate behavior, intimidation, as well as communications and other conduct directed at someone because of that person's protected characteristics. We have an open-door policy and culture of open communication so employees can report in good faith any questions or concerns—whether involving a workplace issue, a concern about suspected illegal or unethical conduct, or any other matter— without fear of retaliation.

Furthermore, unlawful harassment, including sexual harassment, and discrimination of any kind are not tolerated. Preventing unlawful harassment and discrimination is critical to Astreya's continued success and Astreya is committed to promptly investigating good faith reports of harassment and taking any necessary and appropriate remedial action. Accordingly, we have clearly defined and well-communicated policies that prohibit all forms of harassment and discrimination, sexual or otherwise. We also have policies protecting employees from retaliation for raising concerns in good faith.

This interactive training will help you to better understand what is considered unlawful harassment and Astreya's policies with respect to such conduct. It also will show you how to report harassment in our workplace. You are expected to understand Astreya's policies and conduct yourself in a manner consistent with them in every aspect of your job. If you have any questions following this comprehensive training, please reach out to your manager or HR Business Partner for clarification. We are all responsible for creating a positive culture free from harassment and we expect you to do your part.