



Aeyon

Corporate Code of Business Ethics and Conduct

November 2021

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A Message from Our Chief Executive Officer

At Aeyon ("Aeyon"), we are committed to the highest ethical standards and integrity and providing our customers with superior service and exceptional value. It is vital that everyone on the Aeyon team understands the importance of acting with the highest level of ethics, integrity, and transparency. This Code of Business Ethics and Conduct (the "Code") equips us with valuable information that enables consistent ethical behavior so that we all perform our duties both diligently and honestly.

Every Aeyon team member is expected to read this Code, use the information to inform how they conduct themselves and raise any ethical concerns to their manager, a supervisor, or Aeyon's Corporate Compliance Officer, or through the Ethics Hotline. We understand ethical questions can be complex and consistent with our collaborative strategy, we encourage each of our team members to promptly reach out to a supervisor, senior management, or the Corporate Compliance Officer with even the slightest of questions or concerns.

Aeyon reminds you that our customers support those who risk their lives on our nation's front lines, we owe our nation's warfighters the highest standards of performance and ethical conduct.

Sincerely,

Sunny Singh
Chief Executive Officer



1. Our Values

Aeyon was founded on the principles that Aeyon’s customers deserve to work with knowledgeable industry partners whom they can trust and depend on for quality results. Today, Aeyon’s values reaffirm these principles which embody our commitment to professionalism. Aeyon’s core values are:

OPENNESS	INTEGRITY	ACCOUNTABILITY	EXCELLENCE
Treat each other with respect, communicate honestly and openly where ideas can be heard, differences can be aired, and mutual respect is maintained	Act with honesty and with the highest ethical standards and always strive to do the right thing.	Be responsible for our words, actions, and our results.	Continuously improve operations and performance by leveraging our experience, advanced technologies, and functional domain expertise.

2. Applicability

This Code of Business Ethics and Conduct (the “Code”) applies to all of Aeyon’s principals, employees, officers, directors, agents, consultants, independent contractors, subcontractors, and any other individuals acting on behalf of Aeyon or Aeyon’s affiliates and subsidiaries (each a “Team Member”). All Team Members must read this Code and be familiar with its contents and requirements and comply with the Code.

This Code is intended to provide sufficient guidance to enable Team Members to conduct Aeyon’s business with the utmost integrity. This Code does not, however, confer on any Team Member other than Aeyon any additional rights or remedies, and it is not a contract, express or implied, guaranteeing employment for any specific duration, guaranteeing any specific terms or conditions of employment, or continued engagement. Aeyon’s employees are subject to additional policies and procedures, including the Employee Handbook, and other applicable agreements communicated by Aeyon.

Aeyon will review and update this Code as needed and policies stated in the Code may be changed, suspended, or cancelled at any time in the sole discretion of Aeyon.



3. Highlights of the Code

1. Team Members must act ethically, with integrity, and always follow the law, wherever they may be conducting Aeyon business.
2. Team Members must take care to avoid and report any apparent or actual conflicts of interest.
3. Team Members must maintain financial records, data, and information in a timely and accurate manner and in accordance with the law and Aeyon's policies.
4. Team Members must avoid hiring, discussing employment opportunities with, or assigning work to, current Government employees.
5. Team Members must conduct their business professionally, in accordance with Aeyon's values, and the principles governing the Code.
6. Aeyon's assets-including computers, materials, and work time-must not be used for personal benefit.
7. Customers and suppliers are fundamental to Aeyon's success and must be dealt with fairly and honestly.
8. Team Members must never attempt to bribe or improperly influence a government official or any other person with whom Aeyon conducts business.
9. Exports and imports of products and services may not be conducted without the appropriate oversight.
10. Violations of this Code include direct action by a Team Member in violation of the Code, asking other Team Members to violate the Code, not reporting a Code violation, or failing to cooperate in a Code investigation.
11. Violation of this Code may result in disciplinary action, including but not limited to, termination of employment.

Team Members are expected to always follow and fully comply with all applicable laws, rules and regulations, and this Code, wherever they are and in all circumstances. The obligation to comply with all pertinent laws, rules and regulations applies whether the conduct or situation at issue is specifically described in or covered by this Code.

It is an individual responsibility to read, understand, and comply with this Code.

Team Members have a duty to raise concerns about actual or possible violations of this Code and if uncertain about whether any conduct is in violation of the Code, must ask for guidance



from a manager or supervisor or the Corporate Compliance Officer (“CCO”), Duane Piper, who can be reached at (703) 789-2148 or djpiper@aeyon.us, or the Ethics Hotline.

4. Accurate and Honest Recordkeeping and Cost Reporting

Aeyon must maintain timely and accurate records and accounts to ensure that Aeyon’s activities are properly managed and are conducted in compliance with Aeyon’s policies, guidelines, regulations, and legal requirements.

Team Members must ensure that Aeyon’s financial and other records, public disclosures, and all documents and reports filed with any regulatory authority are fair, accurate, and timely, and are in compliance with all applicable policies, regulations, and laws. All business and transactions must be reported in such manner as is necessary to permit the preparation of accurate records and to prevent any fraudulent conduct.

Team Members will cooperate with any audits or investigations. Team Members will not and will not attempt to: improperly influence, manipulate, or mislead any audit, nor interfere with any auditor engaged to perform an independent audit of records, processes, or internal controls.

Cost reports and assessments provided to customers must be both accurate and honest. Whether such costs are direct (as in labor charges) or indirect, they must be precise and consistent with Aeyon’s financial policies.

Team Members will not destroy business or financial records. Where necessary, destruction of records must be conducted in a manner that is consistent with Aeyon’s policies. Should Aeyon be a party to litigation, or the subject of Governmental investigation, Aeyon’s Counsel shall be consulted with respect to policies and procedures for record preservation.

Observance of improper cost reporting, record keeping, interference with audits, or other action in violation of this section must be promptly reported to a manager, supervisor, or the CCO.



5. Conflicts of Interest

Team Members should avoid activities that might result in, or give the appearance of, a conflict between their personal interests and their ability to make objective business decisions on behalf of Aeyon and Aeyon's customers and clients.

As a U.S. Government contractor, Aeyon also has a significant interest in identifying, avoiding, and mitigating Organizational Conflicts of Interest ("OCI"). An OCI is defined by the Federal Acquisition Regulations ("FAR") part 9.5 and can arise when activities or relationships with other persons result in a person being unable or potentially unable to render impartial assistance or advice to the Government, or the person's objectivity in performing the contract work is or might otherwise be impaired, or the person has an unfair competitive advantage.

Team Members that become aware of an actual or potential conflict of interest, whether it is personal or OCI, should promptly report it to their supervisor or the CCO disclosing sufficient information for Aeyon to determine the nature of the conflict of interest without creating additional conflicts.

Conflicts of interest arise out of a variety of circumstances. Any Team Member who believes that he or she may be placed in a situation of personal conflict, actual or potential, should promptly seek guidance from their manager or the CCO.

Below are examples of situations that may give rise to a conflict of interest. These examples are representative but are not exhaustive. If you are unsure as to whether a particular situation gives rise to a conflict of interest, you are encouraged to discuss the matter with your supervisor or the CCO.

Examples of situations where a conflict of interest might arise:

- (a) Having an investment or financial interest in (or having any financial relationship or management or advisory position with) a supplier, customer, or current or potential competitor of Aeyon.
- (b) Engaging in outside business or consulting activities that divert time, interest, or talents from Aeyon's business.
- (c) Serving as a director, paid or unpaid, on the board of any of Aeyon's customers, competitors, business partners, contractors, or suppliers.



- (d) Giving or accepting gifts, hospitality, or entertainment of value from actual or potential suppliers, customers, or competitors.
- (e) Purchasing of property, supplies or services by Aeyon for or from any director or officer of Aeyon, members of a director's or officer's family, or entities in which any of these persons is a director, officer, or owner of that entity's equity interests.
- (f) Developing specifications for future solicitations or procurement opportunities on behalf of the Government.
- (g) Having an immediate family member or member of your household accept a gift from a person or entity that does business with or is seeking to do business with Aeyon.
- (h) Accessing non-public or proprietary information, obtained either from the Government or another contractor, that could be relevant to a new procurement.

6. Recruiting and Employing Former Government Personnel

Federal laws and regulations impose post-employment restrictions on U.S. Government personnel depending upon their rank, grade, or official duties. Federal laws and regulations also impose detailed restrictions on U.S. Government officials and employees regarding the discussions they may have with private companies concerning potential future employment. Accordingly, it is Aeyon's policy not to employ, offer to employ, retain, as an independent contractor, or offer to retain as an independent contractor, any current or former U.S. Government personnel unless: (i) the CCO has verified the action will be in compliance with all applicable laws and regulations and (ii) Aeyon's CEO has provided prior approval for such action.

Where employment or retention of former U.S. Government personnel is permitted, and such former U.S. Government personnel is hired or retained by Aeyon, Aeyon's CCO shall establish such restrictions on the individual as are required to follow applicable laws and regulations. Team Members are required to understand and adhere to any restrictions which may be imposed on the former U.S. Government personnel.

In addition, state and local governments may have similar regulations restricting employment discussions and the employment of current and former state and local government officials and employees. Accordingly, the same guidelines described above should be followed with respect to such officials and employees.



7. Discrimination and Harassment

Aeyon is an Equal Opportunity Employer committed to a work environment in which all individuals are treated with respect and dignity and are free from all forms of harassment and discrimination. Aeyon affords equal opportunities to employees and applicants without regard to sex, race, color, ethnicity, national origin, ancestry, religion, pregnancy, age, sexual-orientation, sexual identity, genetic information, physical or mental disability, medical condition, marital status, veteran status, or any other protected group status. Any form of harassment, even when not unlawful or directed at a protected category, is prohibited, and will not be tolerated.

Team Members are expected to adhere to Aeyon's policy against discrimination and harassment and to promptly report incidents of alleged harassment and discrimination if they witness or become aware of such incident. If Team Members do not feel comfortable reporting harassment or discrimination to their immediate supervisor, the CCO, or the Ethics Hotline they can address their concern directly Aeyon's Vice President of Human Resources, Tani Moore, who can be reached at trmoore@aeyon.us or (202) 520-8569.

Unlawful discrimination, retaliation, or harassment of any type will not be tolerated by Aeyon, and Aeyon will vigorously enforce this policy consistent with all applicable federal, state, and local laws.

8. Health and Safety

Aeyon is committed to protecting the safety, health, and well-being of its Team Members, customers, and clients. Team Members are expected to follow all health and safety rules, to be alert for health and safety hazards and breaches of security, and to promptly report any accidents, injuries, or unsafe conditions.



Aeyon has implemented a drug-free workplace policy. In accordance with this policy, Team Members shall not possess, use, sell, attempt to sell, distribute, manufacture, purchase, transfer, or cultivate drugs at Aeyon's workplace, the Government customer workplace, or while otherwise engaged in company business or representing Aeyon. For the purposes of this Code, "drugs" includes alcohol, tobacco, marijuana, prescription drugs (when not taken as directed or obtained with a valid prescription), as well as illegal inhalants and illegal drugs or controlled substances including, but not limited to, opiates (e.g., heroin, morphine), cocaine, phencyclidine (PCP), and amphetamines.

9. Proper Use of Company Assets and Information

9.1 Proper Use of Company Assets. Team Members may not use Aeyon assets or property, or Government issued property for personal use. This includes, but is not limited to, work product, as well as Aeyon's equipment, computers, computer systems, and software, proprietary and business information, trademarks, and Aeyon's name. Team Members may not utilize the services of Aeyon personnel or utilize Aeyon assets for personal benefit or the personal benefit of anyone outside Aeyon absent prior written approval by the CCO.

9.2 Computer and Electronic Communications. Aeyon may provide computers and related equipment and software to Team Members for use in conducting the business of Aeyon. Aeyon's computer system (which includes all of the software as well as all of the computers or other hardware comprising the computer system) and all information transmitted, received or stored on Aeyon's computer system, are the property of Aeyon. The computers, computer systems, and software are only to be used for purposes related to Aeyon's business and should not be used for personal use. Aeyon reserves the right to monitor the use of its computers, computer systems, software, and other equipment to ensure appropriate use.

Team Members shall not disclose personal or system passwords to anyone other than authorized Aeyon representatives. Team Members may not access or attempt to gain access to another Team Member's computer system, including e-mail, voicemail, or computer or other files without the prior approval of an authorized Aeyon officer.



Only software authorized and properly licensed by Aeyon may be stored or used on Aeyon's computer system. In addition, software on Aeyon's computer systems may not be altered, copied, downloaded, or transferred without advance written approval by Aeyon.

All communications that are made using Aeyon's computer system or other equipment, such as telephones and facsimile machines, should be carried out in a professional manner. All communications should be consistent with Aeyon's business practices and confidentiality policies, must not disclose any Aeyon trade secrets or intellectual property, may not violate any Team Member's rights in any way (*i.e.*, defamation or harassment), and should be treated as if they are a communication with the media.

Aeyon's computers and other equipment may not be knowingly used to transmit viruses and similar harmful code, conduct denial of service attacks, violate any other system's acceptable use policy, or violate the law.

9.3 Company Confidential and Proprietary Information. One of Aeyon's most important assets is its confidential information and the confidential information licensed or otherwise entrusted to Aeyon by others, including, but not limited to, customers and third-party industry partners. Aeyon's legal obligations and its competitive position often mandate that this information remains confidential. It is, therefore, every Team Member's obligation to safeguard both Aeyon's confidential information and the confidential information licensed or otherwise entrusted to Aeyon by others.

Confidential information generally falls into two categories.

- (a) The first category encompasses confidential information that is intended for internal use at Aeyon only. This information typically relates to things such as Aeyon's operations, customer lists, pricing policies, and trade secrets (confidential information used during business to give Aeyon a competitive advantage). It also often relates to technology owned by third parties and licensed, marketed or otherwise used by Aeyon in providing technology evaluation and management services to corporations, government agencies, universities, or other entities. This category of confidential information belongs to Aeyon or is entrusted to Aeyon on a confidential basis, and Aeyon endeavors to keep such information confidential indefinitely.



- (b) The second category, by contrast, involves confidential corporate information that Aeyon routinely discloses at some point to the public. This information often gauges Aeyon's financial performance or identifies events that have or may have a significant or material impact on the value of Aeyon's securities.

Confidential information in either category must not be disclosed by any Team Member to anyone outside Aeyon, except as authorized by the CCO in writing for a legitimate Aeyon business purpose. Even within Aeyon, confidential information should be discussed only with those who have a need to know the information.

10. Policies Regarding Gifts, Gratuities, and Entertainment

10.1 No Bribes, Kickbacks, or Other Improper Payments. Bribes, kickbacks, and other improper payments, whether made to governmental officials or to anyone in the private sector, have no place in Aeyon's business and are strictly prohibited. This prohibition covers both direct payments and indirect payments, such as those made through a consultant, family member, or other third party or reimbursement of Aeyon Team Members for payments made personally by them as well as promises of payment. Furthermore, Aeyon's Team Member shall not directly or indirectly accept any bribes, kickbacks, or other improper payments from any outside parties.

10.2 Business Courtesies. Team Members who offer a business courtesy, i.e., small gifts, meals, gratuities, entertainment, etc., must ensure that such business courtesy cannot reasonably be interpreted as an attempt to gain an unfair business advantage or otherwise reflect negatively on Aeyon.

10.3 Gifts and Gratuities to Government Customers. Most federal, state, and local government employees and officials are subject to strict rules and legal prohibitions regarding the acceptance of gifts. As a general proposition, government employees and officials are not permitted to accept gifts because of their official position or from government contractors who sell goods and services to the Government and other prohibited sources.



Nothing should ever be offered to a government employees or officials, by a Team Member, for the purpose of obtaining favorable treatment for Aeyon. Further permitted modest business courtesies, such as advertising or promotional mementos or the occasional working meal valued up to \$20 a person (not to exceed \$50 in a year), may only be offered by Team Members if first approved by the CCO. If there is any question, Team Members should contact the CCO and err on the side of caution.

11. No Political Contributions

No Aeyon funds or resources, including the work time of any Team Member, may be used to support either directly or indirectly, the campaign of any candidate seeking political office or the activities of any political party. No funds or resources of Aeyon may be used for, or contributed to, any foreign political party, candidate, or committee.

12. Export/Import Compliance

All exports and imports must be effectuated in compliance with applicable U.S. laws and regulations including, but not limited to, the International Traffic in Arms Regulations (“ITAR”) and the Export Administration Regulations (“EAR”) and any export license or agreements as applicable. Team Members may not transfer any export-controlled item, data, or service, to include transfer to any foreign persons (wherever located), without the authority of an export license, agreement, or applicable exemption and in accordance with Aeyon’s export compliance policy made available to all Team Member on Aeyon’s SharePoint site or upon request. Any questions regarding this policy should be directed to the CCO.

13. Human Trafficking

Aeyon conducts its business with respect for human rights and has a strict policy against trafficking in persons, including any trafficking-related activities. Team Members should never use misleading or fraudulent procedures to recruit, and must comply with all applicable anti-trafficking laws, including FAR 52.222-50, Combatting Trafficking in Persons. Aeyon will only do business with contractors and suppliers that have the same respect for the letter and spirit of anti-trafficking laws.



14. Prohibited Contractual Relationships

Government Contractors, like Aeyon are prohibited from knowingly hiring or contracting with individuals or companies who are identified on the Consolidated List of Debarred, Suspended and Ineligible Contractors, available on the System for Award Management (www.sam.gov) or on the Office of Foreign Asset Control's "Specifically Designated" list of nationals or persons who are subject to trade restrictions. Team Members whose names appear on the aforementioned lists must immediately notify Aeyon of such status. Team Members must also immediately sever all business connections with former Team Members whose conduct violates applicable laws, regulations, or this Code and other individuals specifically identified by Aeyon.

15. Protecting Government Information and Assets

Every Team Member is charged with the duty to preserve Aeyon's assets and the property entrusted to Aeyon by our customers and suppliers. This includes intellectual property, financial and proprietary information, software and computer systems. Certain assets and property may have specific requirements for disclosure and safeguarding, each Team Member must take care to understand any related agreements regarding such requirements and abiding by such requirements. Only Team Members who are authorized and have work related reasons may access U.S. Government information and assets. Under no circumstances may Team Members disclose information belonging to the U.S. Government in a manner contrary to law, regulation, and the agreement under which that information was disclosed. Any questions or concerns regarding the protection of assets, property, and information must promptly be conveyed to the CCO.



16. Procurement Integrity

All bids, proposals, and negotiations must be conducted in accordance with Aeyon's prioritization of fairness, honesty, and integrity. Use of deceptive or misleading statements or any unethical attempts to induce award of contracts to Aeyon is unethical and prohibited. Accordingly, Team Members must avoid any actions that subvert the principles enshrined in U.S. laws and regulations including, but not limited to, the FAR and the Procurement Integrity Act.

Team Members shall not solicit or accept any proprietary data or source-selection information regarding a procurement. For this section, "proprietary-data" includes, but is not limited to, information contained in a bid or proposal, cost or pricing data, and any information submitted to the Government by a contractor and properly designated as proprietary. For this section, "source-selection" information includes, but is not limited to, listings of offerors and prices, listings of bidders prior to bid opening, source selection plans, technical evaluations of proposals, competitive range determinations, rankings, source selection board reports and evaluations, source selection advisory board recommendations, and other information determined by the head of the agency or contracting officer to be information which would jeopardize the integrity or successful completion of the procurement if disclosed. Receipt of information regarding a competitor's bid or proposal, whether sent inadvertently or intentionally, must immediately be reported to the CCO. Under no circumstances may such information be utilized in preparing Aeyon's bids or proposals.

17. Dissemination of Information about Aeyon

Aeyon's communications with the public must be honest and accurate. Only the Chief Executive Officer ("CEO") or persons specifically designated by the CEO are authorized to issue press releases or otherwise similarly communicate with the public or others on behalf of Aeyon. All inquiries regarding Aeyon's operations or business interests will be promptly forwarded to the CEO. Additionally, all advertising and promotional activities must also be conducted in a manner consistent with scrupulous business ethics and applicable legal requirements.

18. Authority to Commit Aeyon, Sign Contracts or Incur Obligations



Only those Aeyon individuals granted authority by Aeyon's operating agreement or governance documents can commit Aeyon, sign a contractual document or otherwise incur an obligation on behalf of Aeyon. Aeyon's officers are authorized to delegate, on a limited basis, certain approvals and signature authorities, but such delegations must be authorized in writing on an individual basis and be in accordance with Aeyon's guidance.

19. Reporting Violations

19.1 Team Member Reporting Obligations. Any Team Member who observes a violation any policies in this Code, any law, rule, or regulation applicable to Aeyon's business, or suspects a violation, has a duty to immediately report this to Aeyon.

Aeyon has established the following contacts for reporting violations:

- A. Your immediate supervisor or manager.
- B. The Chief Compliance Officer (CCO), Duane Piper at (703) 789-2148 or djpiper@aeyon.us; or Tani Moore, Aeyon HR Director at (202) 520-8569 or trmoore@aeyon.us
- C. Aeyon's Ethics Hotline (844) 965-3532 or aeyon.ethicspoint.com or mobile at aeyonmobile.ethicspoint.com

The Ethics Hotline may be used for anonymous reporting purposes and is intended for reports of any kind of inappropriate conduct, including without limitation, reports of concerns associated with accounting policies and practices, internal controls, fraud, conflicts of interest, false claims, and auditing policies and practices are encouraged. These contact methods will be posted at Aeyon's jobsites as required by law. At some jobsites, a Government Hotline number will also be posted. Aeyon encourages Team Members to use these hotline resources to report suspected violations. If you are at a jobsite and you do not see hotline information posted at the jobsite, please immediately inform your supervisor or manager, or the CCO or contact the Ethics Hotline listed above.



19.2 Policy of Non-Retaliation. Aeyon prohibits any form of retaliation against a Team Member for filing, in good faith, a truthful report of a violation or suspected violation of Aeyon's Code or any law, rule, or regulation, or for assisting or participating in the investigation of any report of a violation or suspected violation of Aeyon's Code or any law, rule or regulation. Retaliation by any Team Member against any individual who seeks advice, raises a concern, or reports any violation or suspected violation of any law, rule, or regulation, or of the Code, is strictly prohibited and will not be tolerated.

If any Team Member believes Aeyon or any of its Team Members has subjected him or her to any retaliation for reporting suspected misconduct in accordance with this policy, he or she is encouraged to file a complaint with the CCO.

19.3 Supervisor's Reporting Obligations. Supervisors receiving any report of a violation or suspected violation from a Team Member, or any other source will immediately forward it to the CCO. In addition, Supervisors will take immediate corrective action to the extent possible to stop or lessen the effects of any such violation after consultation with the CCO, as appropriate. The CCO will date, track, and prioritize all reports received and will be alert to any pattern of allegations (i.e., subject matter, business unit, individuals, etc.).

19.4 Investigations of Policy Violations. Aeyon takes all reports seriously. The CCO will be responsible for the investigation of all suspected violations of the Code. The CCO will review the reported violation and, upon consultation with outside counsel and others, as appropriate, decide whether to conduct a formal investigation of the matter. The CCO may interview Team Members, at any level within Aeyon and may examine and obtain copies of books, records, or other relevant documents. Team Members must cooperate with the investigation. Failure to cooperate may be the basis for disciplinary action up to and including termination.

19.5 Penalties for Violations. If a Team Member violates any provision of this Code or any applicable law, rule, or regulation, he or she may be subject to disciplinary action. Such disciplinary action may include, but may not be limited to, reprimand, suspension, demotion, reduction, or loss of pay or other compensation, termination, and where required reporting of criminal conduct or civil violations to the proper authorities.



20. Procedures for Requesting and Granting Exceptions to the Code

Situations can arise that warrant an exception to the strict application of this Code. Requests for an exception must be submitted in writing to the CCO. Any such request must describe in detail all pertinent information regarding the proposed transaction or conduct for which the exemption is being requested. In an emergency, a request may be made orally and subsequently confirmed in writing. The necessary approvals for an exemption are required to be obtained in advance of an action requiring the exemption.

21. Periodic Training

Aeyon's commitment to ethics and integrity does not end with the distribution of this policy. Aeyon will conduct an ongoing business ethics awareness and compliance program. This program will include periodic training for Team Members to communicate Aeyon's standards and procedures and other aspects of Aeyon's business ethics awareness and compliance program and internal control system. Aeyon will provide all such information as appropriate to an individual's respective roles and responsibilities. This training will be provided to all Team Members.

22. Implementation of the Corporate Code

Each individual Team Member will be furnished with a copy of this Code. The individual must review the Code and return to the CCO the written acknowledgment of receipt and review of this Code. This acknowledgement will be retained in Aeyon's relevant records.



Code of Business Ethics and Conduct Acknowledgement

I hereby certify that:

- (1) I have received, read, and understand Aeyon's Code of Business Ethics and Conduct dated September 20, 2021 (the "Code");
- (2) I understand and agree to abide by the Code, including the legal and ethical principles outlined in the Code.
- (3) I understand that my manager, supervisor, the Corporate Compliance Officer, and the Ethics Hotline are available to me should situations arise that cause me to be uncertain about the Code or legal and regulatory requirements applicable to my work with Aeyon; and
- (4) I understand any violations of the Code, and legal or regulatory requirements may lead to disciplinary action, up to and including termination.

Name (Please Print)

Signature

Date