

Code of Business Conduct & Ethics Policy

Objective

Purpose

Appfire is a global technology company committed to achieving the highest standards of professionalism and ethical conduct in its operations. You are expected to exercise unyielding integrity and high standards of business conduct in work activities and are responsible to read and understand this Code, and ensure that all agents and contractors are aware of, understand and adhere to these standards. Additionally, in certain respects, as provided below, Appfire business partners, such as subcontractors, channel partners, consultants, vendors, and independent contractors share the fundamental responsibility of compliance with the principles of this Code when conducting business with or on behalf of Appfire.

The Management Board of Appfire Parent, LLC (together with its subsidiaries and affiliates, the "Company" or "Appfire") has adopted this Code of Ethics and Business Conduct (the "Code") to:

1. promote honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest;
2. promote compliance with applicable governmental laws, rules and regulations;
3. promote the protection of Company assets, including corporate opportunities and confidential information;
4. promote fair dealing practices;
5. deter wrongdoing; and
6. ensure accountability for adherence to the Code.

Policy Scope

All directors, officers and employees are required to be familiar with the Code, comply with its provisions and report any suspected violations as described below in the Section entitled 'Reporting and Enforcement'.

Policy Statement

HONEST AND ETHICAL CONDUCT

- The Company's policy is to promote high standards of integrity by conducting its affairs honestly and ethically.
- Each director, officer and employee must act with integrity and observe the highest ethical standards of business conduct in his or her dealings with the Company's customers, suppliers, partners, service providers, competitors, employees, and anyone else with whom he or she has contact in the course of performing his or her job.

COMPLIANCE WITH LAWS AND INTERNAL POLICIES

- You are expected to exercise good judgment and common sense in seeking to comply with all applicable laws, rules, regulations, and Appfire internal policies, including this Code, and to ask for advice when you are uncertain about any of them.
- You must also understand that your manager may have a corresponding obligation to report such information to your HR Business Partner or Legal Department as the circumstances dictate.
- Appfire strictly prohibits reprisal, threats, retribution, or retaliation against any person who has in good faith reported a violation or a suspected violation of law, this Code or other Company policies, or against any person who is assisting in any investigation or process with respect to such a violation.

- The terms of this Code apply worldwide. In the event of a conflict between this Code and applicable local law, local laws shall prevail. In the event there is no conflict between the Code and applicable local law but the Code imposes a higher standard than local law, the higher standard of the Code shall prevail.

AVOIDING BRIBERY AND CORRUPTION – IMPROPER PAYMENTS, GIFTS AND GRATUITIES

- Appfire expects its directors, officers, employees, as well as all those who may otherwise directly or indirectly represent Appfire’s business interests, including but not limited to our agents, contractors, resellers, and channel partners, to protect Appfire’s reputation for integrity in the global marketplace.
- No gifts, gratuities, kickbacks, or other favors to employees or agents of other businesses, particularly customers or suppliers, may be offered in an attempt to obtain an improper advantage or to influence improperly. Likewise, you may not accept any gifts, gratuities, kickbacks, or other favors that may be interpreted as an attempt to influence your performance or behavior directly or indirectly. A business courtesy, such as a gift or entertainment, should never be offered under any circumstances that might create the appearance of impropriety.
- You may not furnish or offer to furnish any gift that is of more than token value or value that goes beyond the common courtesies associated with accepted business practices. When giving a gift, you must adhere to these guidelines:
 - The gift should be provided as a token of esteem, courtesy or in return for hospitality.
 - The gift should be of nominal value but in no case greater than \$250.
 - No gifts in cash.
 - The gift shall be permitted under both local law and the guidelines of the employer/governmental agency.
 - The gift should be a value which is customary for country involved and appropriate for the occasion.
 - The gift should be for official use rather than personal use.
 - The gift should showcase the company’s products or contain the company logo.
 - The gift should be presented openly with complete transparency.
 - The expense for the gift should be correctly recorded on the company’s books and records.
- Appfire customers and suppliers likely have gift and entertainment policies of their own. You must be careful never to provide a gift or entertainment that violates the other company's gift and entertainment policy. Giving or receiving any payment or gift in the nature of a bribe or kickback is absolutely prohibited.
- Countries around the world continue to adopt anti-corruption laws, which make it a crime to make or take bribes. We are committed to conducting our business ethically and in full compliance with all applicable laws of the countries where we conduct business including all laws relevant to countering bribery and corruption, as well as the implementation and enforcement of effective systems to prevent bribery and corruption. The trend of “multi-jurisdictional anti-corruption enforcement” means global companies now face coordinated enforcement efforts and increased scrutiny worldwide. As such, Appfire is committed to continued compliance with the United States’ Foreign Corrupt Practices Act of 1977, the United Kingdom Bribery Act of 2010, the U.S. Anti-Kickback Act, and all applicable anti-bribery and anti-corruption laws, both in the U.S. and internationally. Because of the global nature of our business, the United States and United Kingdom anti-corruption laws are deemed to apply to each Company employee, agent and contractor regardless of where in the world they may be based or working.
- While the core definition of corruption is effectively universal, there are nevertheless significant variations among the various anti-corruption laws that companies must take into account, particularly in light of the trend of multi-jurisdictional enforcement.

A. Foreign Corrupt Practices Act (FCPA)

- The FCPA prohibits offering anything of value to foreign officials for the purpose of influencing that foreign official or to secure any improper advantage to obtain or retain business.
- The FCPA also requires strict internal accounting controls (applicable to public companies) to prevent concealment of bribery or other financial transactions.
- Employees, officers and directors must never (i) engage in any activity inconsistent with, or in violation of, the anti-corruption laws and regulations covered by the FCPA, or (ii) offer, accept, demand, or solicit incentives to or from foreign or domestic government officials or agents, whether directly or indirectly, in the hopes of influencing that individual.

- Employees, officers, and directors must never give gifts, gratuities or other payments directly or indirectly to domestic or foreign government officials in an effort to obtain or retain business for Appfire or to obtain any special or unusual treatment in connection with a business transaction.

B. U.K. Bribery Act of 2010 (UK Bribery Act)

- The UK Bribery Act criminalizes, (i) bribing another person or receiving a bribe; (ii) bribing foreign officials; and (iii) for corporations or commercial organizations, failing to prevent bribery, no matter where in the world the act takes place. Listed below are three common offenses under the UK Bribery Act:
 - Promising, offering or giving a bribe (financial or otherwise; including, without limitation, facilitation payments, meaning small, unofficial payments to secure or expedite a routine action) either directly or indirectly.
 - Receiving a bribe (financial or otherwise; including kickbacks, meaning payments made in return for a business advantage) either directly or indirectly.
 - Bribing a foreign public official to obtain or retain business.

C. Hospitality

- Reasonable gifts, meals, entertainment, and other business hospitality and amenities (“Hospitalities”) of modest value are generally permissible business courtesies when dealing with non-government entities.
- Hospitality should never be given or received in consideration for, or in expectation of, action by the recipient. Whether the price of a meal or entertainment is reasonable depends on the particular facts and circumstances of the situation and shall in all instances comply with our Travel and Expense Reimbursement Policy.
- Because the reason for a gift, gratuity, favor, or payment may be subject to misinterpretation, Appfire prohibits any expenditures of any kind which may have the perception of bribery. Further, each expenditure and financial transaction must be accurately recorded in Appfire accounting records. As such, do not hesitate to ask your manager or a member of the Appfire Finance Department for guidance.

D. Training

- Appfire will regularly communicate its anti-bribery policy to its employees via mandatory annual online training (via Appfire University).

MAINTAINING FREE COMPETITION AND ANTI-LOBBYING

- We will always compete fairly and honestly, not through unethical or illegal business practices in restraint of trade which may reduce competition.
- We abide by applicable antitrust laws whenever we form partnerships or teams, and wherever we do business. U.S. federal and state antitrust laws, as well as international competition laws, prohibit various practices that could limit competition or restrict fair trade. Under these laws, companies may not enter into agreements with other companies, however informally, that unreasonably restrict competition.
- All agreements with partners, customers, and suppliers, relating to pricing, exclusivity, territories or buying requirements must be vetted by Procurement and/or Legal, as Appfire policy and processes so require.
- Additionally, neither you nor an Appfire agent, contractor or partner may engage in “lobbying” on Appfire’s behalf, including efforts to influence any officer or employee of any governmental agency, any member or employee a legislative body or employee in the formulation of legislation on their behalf in connection with any opportunity or sale. All such activities must be reported to Appfire Legal and Finance, in advance, so that Appfire can keep complete the necessary disclosures and maintain accurate records of all payments of any kind made by it with respect to such matters, including bona-fide commissions, service fees, or other payments.

INSIDER TRADING

- All directors, officers and employees are prohibited from engaging in, or assisting others in engaging in, any transactions involving the securities of any other entity with whom Appfire is engaged (such as suppliers or

customers) in a business transaction, while you are in possession of any material non-public information about the entity (meaning information that significantly affects, or would reasonably be expected to affect, the market price or value of securities).

- You are also prohibited from communicating any such information to others who might trade securities based on that information. Such acts may constitute violations of the law and could result in criminal prosecution of both you and Appfire or result in serious fines or penalties. Material non-public information may include financial and key business data; merger, acquisition, or divestiture discussions; award or cancellation of a major contract; changes in key management; forecasts of unanticipated financial results; and other similar information. Each Employee should be familiar with and abide by Appfire's Material Non-Public Information Policy.

AVOIDING CONFLICTS OF INTEREST

- Related-party transactions are those in which the parties do not deal with one another at arm's length, such as when an employee of Appfire, who is in a position of influence, is involved in a business transaction between Appfire and: (1) an Immediate Family Member (i.e., any child, stepchild, parent, stepparent, spouse, sibling, mother-in-law, father-in-law, son-in-law, daughter-in-law, brother-in-law or sister-in-law of a person, and any person (other than a tenant or an employee) sharing the household of such person); (2) a non-company organization (non-affiliate) for which he or she currently serves as an officer or director, trustee or partner, or for which he or she has recently served in such capacity; or (3) any individual or organization with whom he or she is negotiating, or with whom he or she has an arrangement, concerning prospective employment.
- You should avoid related-party transactions. If you believe that a related-party transaction exists or might occur, you must make full disclosure to the General Counsel. After such full disclosure, the existing or potential conflict will be reviewed, and a decision will be made about whether the related-party transaction is permissible. Each Employee should be familiar with and abide by Appfire's Related Party Transaction Policy.

PROTECTION AND PROPER USE OF COMPANY ASSETS

- All directors, officers and employees should protect the Company's assets and ensure their efficient use. Theft, carelessness and waste have a direct impact on the Company's profitability and are prohibited.
- All Company assets should be used only for legitimate business purposes, though incidental personal use is permitted. Any suspected incident of fraud or theft should be reported for investigation immediately.
- The obligation to protect Company assets includes the Company's proprietary information. Proprietary information includes intellectual property such as trade secrets, patents, trademarks, and copyrights, as well as business and marketing plans, engineering and manufacturing ideas, designs, databases, records and any nonpublic financial data or reports. Unauthorized use or distribution of this information is prohibited and could also be illegal and result in civil or criminal penalties.

CONFIDENTIALITY

- Directors, officers and employees should maintain the confidentiality of information entrusted to them by the Company or by its customers, suppliers or partners, except when disclosure is expressly authorized or is required or permitted by law.
- Confidential information includes all nonpublic information (regardless of its source) that might be of use to the Company's competitors or harmful to the Company or its customers, suppliers or partners if disclosed.

FAIR DEALING

- Each director, officer and employee must deal fairly with the Company's customers, suppliers, partners, service providers, competitors, employees and anyone else with whom he or she has contact in the course of performing his or her job.
- No director, officer or employee may take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of facts or any other unfair dealing practice.

PROHIBITION OF "SIDE LETTERS"

- Any agreement, letter or arrangement, whether oral or written, including through email or other electronic media, that is not part of the underlying paperwork of the primary contract or agreement is a side letter or agreement and is strictly prohibited. These prohibited side letters and agreements are often used to reach agreement on issues the primary contract does not cover or to create some form of contingency and can have significant financial and operational impact on the business, and often expose the company to business and finance risk.

EQUAL EMPLOYMENT OPPORTUNITY, ANTI-DISCRIMINATION AND ANTI-HARASSMENT PRACTICES.

- Appfire brings together employees with a wide variety of backgrounds, skills, and cultures. Combining this wealth of talent and resources creates our diverse and dynamic teams that drive excellence. All of our colleagues, job applicants and business partners will be treated with respect and judged solely on the basis of their qualifications, demonstrated skills and achievements. In making employment decisions (for instance, hiring, recruiting, training, promotions), Appfire will not consider race, color, national origin, ancestry, citizenship, religion, gender, sexual orientation, gender identity, age, marital status, physical or mental disability, veteran or military status, genetic predisposition, or any other protected status or characteristic under federal, state, or local law unrelated to the ability to perform the job.
- We encourage you to bring any problem, complaint, grievance, or concern regarding discrimination to the attention of the Appfire HR Department. We hope to create and maintain a collegial work environment where everyone is treated with respect and dignity. In keeping with this commitment, we will not tolerate any kind of harassment by anyone, including any manager, supervisor, co-worker, vendor, client, or customer, whether in the workplace, at assignments outside the workplace, at company-sponsored social functions or elsewhere. Each Employee should be familiar with and abide by Appfire's Anti-Harassment Policy.

FAIR WORKING CONDITIONS AND HUMAN RIGHTS

- Appfire respects fundamental human rights and believes that every individual deserves to be treated fairly and with dignity.
- Appfire will support fundamental human rights. Appfire's commitment to human rights, including our position on forced labor, involuntary labor, child labor, and human trafficking, is a fundamental principle of Appfire and this Code.
- Appfire will not knowingly work with business partners who employ children or forced labor. Although we consider the Appfire exposure to modern slavery and human trafficking risk to be low Appfire demands that Appfire business partners, such as agents, subcontractors, resellers/channel partners, consultants, vendors, and independent contractors demonstrate the same commitment to high standards of ethical conduct and to act in a socially responsible manner.
- Further, Appfire will not tolerate physical abuse. Appfire will respect employees' lawful right to exercise free association, and we will recognize the right of our employees to choose or not choose collective bargaining representation.

HEALTH, SAFETY, AND ENVIRONMENT LAWS

- Health, safety, and environmental responsibilities are fundamental to Appfire's values. Appfire recognizes its responsibility to conduct business in a way that protects and improves our environment and the community. As we discover, develop and market our products, we will continue to work to minimize our environmental impact in all our processes. We strive to minimize our use of natural resources, reduce waste, and mitigate our impact on climate change.
- In addition, Appfire is committed to providing a safe and healthy workplace and complying with all relevant health and safety laws. All employees are therefore required to comply with all applicable health and safety laws, regulations and policies relevant to their jobs.
- If you have a concern about unhealthy or unsafe conditions or tasks that present a risk of injury to you or others, please report these concerns immediately to your manager or the Appfire HR Department. We can only achieve our goal of a safe and healthy workplace through the proactive participation and support of everyone.

REPORTING AND INVESTIGATION OF VIOLATIONS

1. **Reporting.** If you have any information or knowledge regarding any violation or suspected violation of the contents of this Code, you have a responsibility to report such information in accordance with Appfire's Ethics Reporting Policy. Failure to report a violation is itself a violation and may result in disciplinary action, up to and including termination.
2. **Investigation.** If we conduct an investigation following a report, we will do our best to keep the proceedings and the identity of the reporting employee confidential. Employees are encouraged to pursue all internal reporting channels through completion and reasonably consider the results of our investigation prior to reporting matters outside of Appfire.
3. **Enforcement.** The Company must ensure prompt and consistent action against violations of this Code and take action in accordance with Appfire's Ethics Reporting Policy. Upon receipt of a determination that there has been a violation of this Code, the Management Board or the General Counsel will take such preventative or disciplinary action as it deems appropriate, including, but not limited to, reassignment, demotion, dismissal and, in the event of criminal conduct or other serious violations of the law, notification of appropriate governmental authorities.
4. **Waivers.** Each of the Management Board (in the case of a violation by a director or executive officer) and the General Counsel (in the case of a violation by any other person) may, in its discretion, waive any violation of this Code.

Prohibition on Retaliation

- We will not accept or allow any retaliation based on good faith reporting made hereunder. For instance, an employee who in good faith reports a suspected violation may not be fired, demoted, or otherwise subject to an adverse employment action based on such reporting. Please note, however, that while employees may not be disciplined for *reporting* a violation, employees may be subject to discipline with respect to the underlying conduct or violation.
- This Code is not intended to restrict communications or actions protected or required by state or federal law.

ADDITIONAL AND RELATED INFORMATION AND POLICY

- The principles described in this Code are general in nature so you should also review all applicable Company policies and procedures for more specific instruction and contact the your HR Business Partner or Legal Department if you have any questions. A complete list of policies can be found at the Compliance Portal

CONSEQUENCES FOR NON-COMPLIANCE

- The matters covered in this Code are of the utmost importance to the Company and its business partners and are essential to the Company's ability to conduct its business in accordance with its stated values. We expect all our employees, agents, contractors and consultants to adhere to these rules in carrying out their duties for the Company.
- The Company will take appropriate action against any employee, agent, contractor, or consultant whose actions are found to violate these policies or any other policies of the Company. Disciplinary actions may include immediate termination of employment, or business relationship, at the Company's sole discretion. Where the Company has suffered a loss, it may pursue its remedies against the individuals or entities responsible. Where laws have been violated, the Company will cooperate fully with the appropriate authorities.

ADMINISTRATION OF THIS POLICY

- The General Counsel is responsible for the administration of this Code. If you have any questions regarding this Code or if you have questions about conflicts of interest that are not addressed in this Code, please contact the General Counsel.
- Nothing in this Code, or in any referenced Appfire policies and procedures, creates or implies an employment contract or term of employment.

- We are committed to continuously reviewing and updating our policies and procedures. Therefore, this Code is subject to modification. This Code supersedes all other such codes, policies, procedures, instructions, practices, rules or written or verbal representations to the extent they are inconsistent.

Violation of this Policy

- Employees who violate this Policy may be subject to discipline, up to including termination.