

Ethics Reporting Policy

Objective

Purpose

Appfire is committed to lawful and ethical behavior in all of its activities and requires directors, officers, employees, contractors and volunteers ("**Reporting Individual**") to act in accordance with all applicable laws, regulations, and policies and to observe high standards of business and personal ethics in the conduct of their duties and responsibilities.

As employees and representatives of Appfire, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations. This Policy also provides details on Reporting Individuals can raise concerns regarding suspected illegal or unethical conduct or practices or violations of Appfire's policies on a confidential and, if desired, anonymous basis.

The purpose of this ethics reporting policy (the "**Policy**") is to:

- Alert Reporting Individuals that Appfire expects lawful and ethical behavior to be practiced and that there is an established process for reporting behavior, not in line with its expectations.
- Encourage and enable Reporting Individuals to raise concerns regarding suspected illegal or unethical conduct or practices or violations of Appfire's policies on a confidential and, if desired, anonymous basis.
- Protect Reporting Individuals from retaliation for raising such concerns.
- Establish policies and procedures for Appfire to receive and investigate reported concerns and address and correct inappropriate conduct and actions.

Policy Scope

All Appfire employees and representatives of Appfire.

Policy Statement

Reporting Responsibility

- Each Reporting Individual has the responsibility to report in good faith any concerns about actual or suspected violations of Appfire's policies or any federal, state, or municipal law or regulation governing Appfire's operations (each, a "**Concern**").
- Appropriate subjects to report under this Policy include but are not limited to financial improprieties, accounting or audit matters, ethical violations, or other similar illegal or improper practices, such as:
 - Harassment
 - Fraud
 - Theft
 - Embezzlement
 - Bribery or kickbacks
 - Misuse of Appfire's assets or confidential information

- Undisclosed conflicts of interest
- Corruption
- Misconduct that violates Appfire's Code of Ethics and Business Conduct

No Retaliation

- This Policy is intended to encourage and enable Reporting Individuals to raise Concerns within Appfire for investigation and appropriate action. With this goal in mind, no Reporting Individual who, in good faith, reports a Concern shall be subject to harassment, retaliation, or, in the case of an employee, adverse employment consequences because of such report or participation.
- This protection extends to Reporting Individuals who report in good faith, even if the allegations are, after an investigation, not substantiated.

How to Report Concerns

- All Concerns should be reported as soon as practicable consistent with this Policy. When reporting Concerns, the Reporting Individual should describe in detail the specific facts that support the report.
- Appfire has an open-door policy and whenever possible, the Reporting Individual should first seek to resolve concerns by reporting issues directly to their manager. However, if any of the following apply, the Reporting Individual should follow the procedures outlined in this policy:
 - The Reporting Individual reasonably believes that the manager will disregard or otherwise not fairly consider the Concern.
 - The manager or another influencing leader is a subject of the Concern.
 - The Reporting Individual does not feel comfortable discussing the Concern with the manager.
- Concerns should be reported in writing to the General Counsel: Christine.alpers@appfire.com (the "**Compliance Officer**").
- The Concern may also be submitted anonymously through Appfire's EthicsPoint Incident Management system by going online to <https://secure.ethicspoint.com/> or calling:

US / Domestic: 844-235-2739

Canada / Domestic: 844-235-2802

Bulgaria / OneConnect: 0800 46 303

Germany / OneConnect: 0800 1816559

Poland / OneConnect: 800005237

Spain / OneConnect: 900751039

- Because it is impossible to seek additional information from a Reporting Individual about anonymous reports, it is essential that such reports contain as much specific information as possible.
- If the Compliance Officer is the subject of the Concern or the Reporting Individual is not comfortable reporting the Concern to the Compliance Officer, the Concern may alternatively be reported to Jagdish Chugani at jagdish.chugani@appfire.com ("CPO"). Each of the Compliance Officer and CPO herein referred to as "**Investigating Officer**", as applicable.

Acting in Good Faith

- Anyone reporting a Concern must act in good faith and have reasonable grounds for believing the matter raised is a serious violation of law or policy or a material accounting or auditing matter.
- The act of making allegations that prove to be unsubstantiated, and that prove to have been made maliciously, recklessly, with gross negligence, or with the foreknowledge that the allegations are false,

will be viewed as a serious disciplinary offense and may result in discipline, up to and including dismissal from the volunteer position or termination of employment. Depending on the circumstances, such conduct may also give rise to other actions, including civil or criminal lawsuits.

Handling of Reported Concerns

Investigating Officer

- The Investigating Officer is responsible for:
 - Promptly investigating or overseeing the investigation of each reported Concern.
 - Advising the Management Board confidentially of any Concern that may adversely impact Appfire.
 - Reporting material compliance activity to the Management Board at each regularly scheduled Board meeting.

Acknowledgment of Receipt

- Any supervisor, manager, or Board member who receives a report of a Concern must promptly notify the Investigating Officer of such report in writing.
- The Investigating Officer shall notify the reporting individual and acknowledge receipt of each reported Concern within five (5) business days, unless the report was submitted anonymously, or no return address is provided.

Investigation

- The Investigating Officer shall conduct a prompt, discreet, and objective review or investigation based on the submitted report.
- A full investigation may not be possible if a report made anonymously is vague or general.
- If deemed necessary in his or her sole discretion or upon the recommendation of the Management Board, the Investigating Officer may engage legal counsel, accountants, or other experts to assist in the investigation.
- The Investigating Officer may delegate the investigation responsibilities to any Board committee or other individual, including third parties, as long as:
 - The delegate is not a subject of the reported Concern.
 - The delegate does not compromise the identity of the Non-Profit Individual who reported anonymously or confidentially.

Resolution

- The Investigating Officer shall:
 - Recommend appropriate corrective action to the Management Board, if warranted by the investigation.
 - Oversee the implementation of a resolution based on the determination of the Board.
 - Follow up with the reporting individual, if possible, for closure of the reported Concern.

Accounting and Auditing Matters

- The Investigating Officer shall immediately notify the Management Board of any Concerns regarding accounting practices, internal controls, or auditing, and shall work with the Management Board until the matter is resolved.
- The Investigating Officer and CPO, as applicable, shall have full authority to investigate concerns reported to them in accordance with this Policy and may retain outside legal counsel, accountants, private investigators, or any other resource that they reasonably believe is necessary to conduct a full and complete investigation of the allegations, to determine if the allegations are true, whether the issue is material and what, if any, corrective action should be taken.
- All Concerns filed in accordance with this Policy will be investigated with due care and promptness.
- The CEO shall notify the Management Board of any such investigation conducted by him or her.
- After the conclusion of the investigation, the CEO will issue a full report of all matters raised under this policy to the Management Board.
- The Management Board may appoint a Committee to conduct a further investigation upon receiving the report from the CEO. Upon the conclusion of any investigation or decision not to further investigate, such Committee shall promptly report its findings to the Management Board.

Confidentiality

- Reports of Concerns, and investigations pertaining thereto, shall be kept confidential to the extent possible. However, consistent with the need to conduct an adequate investigation, Appfire cannot guarantee complete confidentiality.
- Disclosure of information relating to an investigation under this policy by Appfire staff, directors, or others involved with the investigation of Concerns to individuals not involved in the investigation will be viewed as a serious disciplinary offense and, may result in discipline, up to and including dismissal from the volunteer position or termination of employment. Depending on the circumstances, such conduct may also give rise to other actions, including civil or criminal lawsuits.

Administration of this Policy

- Appfire expressly reserves the right to change, modify, or delete the provisions of this Policy without notice.
- The Legal Department is responsible for the administration of this Policy. All employees are responsible for consulting and complying with the most current version of this Policy. If you have any questions regarding this Policy or concerning the scope or delegation of authority, please contact the Legal Department at legal@appfire.com.