



Code of Conduct and Ethics

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Code of Conduct and Ethics

Do Right. Do Great Things.

The Code of Conduct and Ethics (“Code”) of Ensono Holdco GP LLC (together with its subsidiaries, “Ensono” or the “Company”), as adopted by the Company’s Board of Directors is just that simple - Do Right. Our reputation as an industry leader is based on being innovative and delivering outstanding customer service while upholding the highest standards of integrity. Our business relationships are built on trust, and are sustained by our core values of honesty, reliability, collaboration, curiosity and passion. We trust and require that each person that performs work on behalf of the Company (collectively, “Associates” and individually “you”) Do Right by (a) promoting honest and ethical conduct, (b) ensuring compliance of applicable laws, rules, and regulations, (c) protecting Company assets and value, and (d) assuring an environment of honesty, fairness, respect, transparency and accountability to one another, our clients and stakeholders.

The Guidelines provide additional definition on what it means to Do Right. However, the Guidelines are not intended to be comprehensive and where situations are not specifically addressed, we trust and expect Associates to exercise good judgment and strong character to Do Right.

Associates should also familiarize themselves with the Company’s Associate Support Book and other applicable policies which outline employment practices for Associates. Any such other applicable policies that are referenced in this Code form a part of this Code as if fully set forth herein. The Associate Support Book and policies are available on the Company intranet. Through proactive initiatives, education, and open dialogue, the Company’s desire is to create an environment where all associates feel valued, respected, and empowered. This commitment aligns with our broader corporate responsibility to contribute positively to society. You are expected to treat others with respect, regardless of differences in race, gender, ethnicity, religion, age, sexual orientation, disability, or any other characteristic. Inclusion should be actively practiced in all interactions and collaborative efforts, avoiding discriminatory actions or behaviors. Associates are reminded that good judgement and strong character requires self-discipline and control along with respect for others. These attributes are required in any scenario related to an associate's employment whether in person, virtual/online, in a social setting or representing the company in any capacity or environment.

If you have a question about any of the matters covered in this Code, we encourage you to contact the Culture and People Experience team (CPE) or the Company’s Chief Legal Officer.

The Code is reviewed on an annual basis and may be updated from time to time. Any amendment of this Code must be approved by the Company’s Board of Directors.

Guidelines | Code of Conduct and Ethics

These Guidelines seek to further define what it means to Do Right. The scenarios and examples described in these Guidelines are not exhaustive. Associates should consult the Associate Support Book or other applicable policy documents for more information and direct any questions regarding any of the matters discussed in these Guidelines to the Culture and People Experience team (CPE) or the Company's Chief Legal Officer.

1. Honest and Ethical Conduct; Conflicts of Interest

You are expected to act and perform your duties lawfully, ethically and honestly. We trust that you will represent the Company with the utmost integrity and avoid any conduct that might even give the appearance of impropriety.

Conflicts of Interest. While working for the Company, there may be situations where your personal interests, or the interests of a friend or family member, conflict or interfere with the Company's interests. You should attempt to avoid these situations. However, if a conflict like this arises, we expect you to use sound judgment to act in the best interests of the Company. Put simply, you should never use your position with the Company to obtain any improper personal benefit or use Company time to engage in any outside, unrelated business. If you believe you cannot avoid a conflict of interest, you should immediately disclose the situation to the Company and wait for the Company's approval before taking any action.

The following scenario demonstrates how a conflict of interest may arise and the proper manner to respond to such conflict:

Scenario: An Associate has learned that her department is negotiating a contract that will make her husband's company a major Company supplier. Could this create a conflict of interest?

Resolution: Yes, a conflict of interest or the appearance of a conflict of interest might arise in this situation. The Associate should notify her manager of her personal relationship with this company and remove herself from the decision-making process. By doing so, she can avoid a situation that may improperly influence, or appear to improperly influence her department's ability to make an objective business decision.

Gift Policy. Business gifts and entertainment can be designed to build understanding and goodwill among business partners. However, you must be careful when accepting gifts from or giving gifts to the Company's competitors, customers, or suppliers. While such gifts are not necessarily prohibited, they can easily create a conflict of interest or the appearance of a conflict. You cannot give or accept any gift that might be construed to violate any laws or constitute any form of bribery. You should avoid giving or

receiving cash gifts (cash, credit cards, gift certificates, etc.) or any gifts of significant value (e.g., greater than \$250). Ultimately, we expect you to use sound judgment in deciding if the gift would be appropriate and seek the Company's approval if it appears questionable. Examples of acceptable gift giving include welcome gift baskets, celebratory dinners, cookies, sponsorship of charity table, sporting event outings, or Company shirts, pens or other similar items.

The following scenario demonstrates how a gift can be provided to a client without creating a conflict of interest:

Scenario: An Associate is sending out gifts to her larger clients at the end of the year to thank them for their business. She decides to send a small gift basket with assorted fruits and chocolates, valued at \$45 per basket. The Associate has confirmed that none of the clients have advised the Company that those clients have a policy prohibiting such gifts. Is this an appropriate gift and gift amount for her to send?

Resolution: Yes, this gift basket is an appropriate gift. It adheres to the Company's policy and the Associate has confirmed that none of the clients have advised the Company of a policy prohibiting it. It is nominal in value, unsolicited and it does not put the clients in a position where they may appear biased or pressured to make a business decision. Please note that gifts should not be provided during a pitch process, or where it could be interpreted that the gift is being sent in order to try to win business, or if the client has advised the Company that it has a policy prohibiting such gifts. If the Associate is unsure if this is appropriate, she could ask her manager or CPE for clarification.

Political Activities. The Company encourages everyone to participate in the political process. However, when participating, you must not give the impression that you speak or act on behalf of the Company. You also cannot use Company time or resources to engage in such activities nor can you make any political contributions in an effort to improperly induce business for the Company.

2. Compliance with Laws

Associates are expected to comply with all applicable laws, rules and regulations in addition to the provisions of the Code. There are no exceptions to this policy and violations may result in immediate termination or disciplinary action. Below are some areas to particularly keep in mind.

Anti-Corruption and Anti-Bribery. You are expected to comply with all anti-corruption and anti-bribery laws, rules and regulations of the countries in which the Company does business, including, among others, the United States Foreign Corrupt Practices Act and the UK Bribery Act 2010. You may never offer payments or gifts to anyone in order to induce them to take a particular course of action, like make a sale or purchase. Similarly, you may not accept any payment or gift from anyone for the purpose of taking or refraining to take any action that improperly benefits or appears to improperly benefit the Company.

Examples of improper payments may include: (a) gifts, entertainment or other business promotional activities; (b) covering or reimbursing an official's expenses; (c) offers of employment or other benefits to a family member or friend of a foreign official; (d) political party and candidate contributions; (e) charitable contributions and sponsorships; (f) in-kind contributions; (g) investment opportunities, stock options or positions in joint ventures; and (h) favorable or steered subcontracts.

However, improper payments should not be confused with reasonable and limited expenditures for gifts, business entertainment, and other legitimate activities related to Company business that are otherwise permitted by applicable laws, rules and regulations.

Fair Competition and Antitrust. The Company is committed to complying with all applicable anti-trust laws. These laws are designed to ensure fair competition and, simply put, prohibit companies from using their market power to disadvantage consumers. To ensure compliance with these laws, you should not have discussions, or enter into agreements, with competitors that would potentially harm consumers or restrain competition. This could include affecting prices, bids, dividing sales, territories, products, or conditioning the sale of products or services on an agreement to buy other products or services.

Insider Trading. You may learn relevant non-public (“inside”) information about companies that do business with the Company. Under United States law and laws in other jurisdictions, it is illegal for Associates to trade, buy, or sell stocks or securities, in breach of a fiduciary duty or other relationship of trust and confidence, on the basis of material, non-public information, or to provide such information to others who then engage in the same trading activity. Such action could result in civil and criminal penalties and justify termination of employment.

Anti-money laundering. Anti-Money Laundering (“AML”) procedures aim to detect, prevent and result in the reporting of suspicious activities to prevent financial crimes. AML issues can arise or occur through events or activities that are not typical for the particular industry or business. More specifically, many times these business activities, upon closer review, do not appear to have any legitimate economic purpose or reason. The Company provides Associates with annual training which includes common fact patterns of potential money laundering and “red flags” to watch out for.

Forced Labor. The Company is committed to treating everyone who works at or with the Company with dignity and respect and strictly prohibits any form of forced labor, slavery and human trafficking in its business and within its supply chain. For more details, refer to the Company’s Anti-Slavery Statement, available on the Company website.

Working with Public Sector Entities and Individuals Dealing with government entity or government-owned or controlled entities (collectively, “GOEs”), their representatives, and government officials or their family members raise unique business and compliance issues, and the regulations and procedures around public sector procurement are complex and vary widely. These regulatory areas can implicate in particular the anti-corruption, anti-bribery and fair competition and antitrust laws discussed above, as well as compliance with all laws and Company policies concerning access to sensitive information (including advance copies of solicitation or tender documents and government planning and budgetary documents) that has not been made available to the general public or to all bidders, pre-bid communications activities with government agencies, “pay-to-play” laws and issues around contract fulfilment. To the extent you work in this area, it is your responsibility to be aware of and comply with applicable regulations and requirements while working with GOEs. You are encouraged to contact your manager, CPE, and/or the Legal department with any questions or for advice.

Environmental, Social and Corporate Governance (“ESG”) The Company is committed to operating in a way that betters the world around us. To achieve this objective, the Company maintains policies and initiatives that aim to reduce environmental impact, foster diversity, equity and inclusion and development, and assure robust governance and data security practices. For more details, refer to the

Company's policies on information security, data protection and privacy, and the ESG Brief, available on the Company website and intranet.

3. Responsible Use and Protection of Company Assets and Information

The Company provides Associates with a variety of devices and technology to ensure that they can perform their duties at the highest level, which should only be used to conduct Company business. Furthermore, the Company expects that Associates use Company information and technology only in accordance with established Company policies. You should also be mindful of the fact that the Company has the right to access, review, or monitor its devices and systems as well as information sent to or from its devices and systems.

Proprietary Information and Intellectual Property. You will have access to some of the Company's most valuable assets: its intellectual property and proprietary information. The Company expects you to keep those materials confidential both during and after your employment with the Company. In particular, you must take caution to protect such material when storing it on your work device or transmitting it internally. You should also be careful when discussing Company business in public. Ultimately, we expect you to protect all confidential material in accordance with the Company's policies and any applicable non-disclosure agreement.

Data Privacy and Cybersecurity. The Company possesses a variety of personal information (e.g., physical addresses, phone numbers, e-mail addresses, government identification numbers, banking and payroll information, employment data, etc.) relating to Associates, clients, suppliers and contractors. This information may be subject to privacy protections in many jurisdictions. You should not access or disclose this information unless authorized to do so for legitimate business reasons and in accordance with the Company's policies. If you believe you are required to transfer this information to another person – particularly to anyone outside the country from which it is collected – please consult with the Company's Legal team first. Similarly, the Company requires you to follow the Company's policies regarding cybersecurity, which are set out in the Company's Information Security Policy, Associate Support Book and/or other applicable policy documents.

Books and Records; Record Keeping. You are expected to honestly and accurately create and maintain all necessary business records in reasonable detail and created in accordance with all legal and accounting requirements. If asked to assist in the creation or maintenance of these records, you should respond to such request promptly, seriously and fully. Similarly, if you collect information as part of your daily job that needs to be retained or disposed for business or legal reasons, you should do so in a manner that complies with all applicable laws and the Company's policies. If you have a question about what materials you should retain or the length of time you should retain a record, please consult the Company's Retention Policy or contact the Company's Legal team.

4. Accountability and Reporting

This Code is simply intended to be a statement of certain fundamental principles, policies and procedures that govern all Associates in the conduct of the Company's business. It is not intended to and does not create any rights in any Associate, customer, supplier, competitor, shareholder or any other person or entity.

Associates must report any suspected violations of this Code, any policy referenced herein or any law, rule or regulation to their manager, CPE and/or the Chief Legal Officer, or directly to a government

authority, as appropriate. If an Associate is uncomfortable with any of those channels or wishes to make a report anonymously, Associate may report the concern using Company's independent reporting provider by visiting https://secure.ethicspoint.com/domain/en/report_custom.asp?clientid=59408 or by calling hotline number based on your location (available 24 hours a day, 7 days a week):

- United States of America: 1-844-462-9380
- United Kingdom: 0-800-89-0011, at prompt dial 844-462-9380
- India: 000-117-844-462-9380
- Poland: 0-0-800-111-1111, at prompt dial 844-462-9380
- Germany: 0-800-225-5288, at the prompt dial (844) 462-9380

We further expect you to provide truthful testimony at any corresponding legal proceedings. –Such truthful testimony will not be construed as a violation of any Company agreement or policy. We also trust that you will take appropriate action, when possible, to stop any known or suspected violations by your coworkers.

The following scenario describes an incident that could reasonably involve a violation of the Company's policies and therefore must be reported:

Scenario: An Associate overhears a phone call that leads her to believe proprietary client information has been given to a competitor by a team leader. However, there is no solid proof and the Associate fears if it is reported, the team leader will fire him or her.

Resolution: In this scenario, the Associate should report the suspicion so that it can be investigated. The Company has a no-retaliation policy that prohibits adverse action toward an Associate for reporting ethical violations in good faith.

The Company understands that ethical situations can be complex. So, if you are unsure whether a violation has occurred, you should contact CPE or the Chief Legal Officer. As long as you report a suspected violation in good faith, the Company will attempt to keep your identity confidential and ensure that no retaliatory action is taken against you. However, please know that this protection does not extend to any personal wrongdoing.

5. Waivers

Any exceptions to this Code must be approved by the Chief Legal Officer.