

## CODE OF CONDUCT

Parsolvo, LLC ("the Company") is committed to upholding the highest standards of integrity, transparency, and ethics in all business dealings, globally. This Code of Conduct Policy ("Policy") outlines the principles and guidelines to ensure compliance with applicable anti-corruption laws, including but not limited to, the US Foreign Corrupt Practices Act (FCPA), and other relevant local, national, and international laws.

### SCOPE

This policy applies to all employees, contractors, consultants, agents, and any third party acting on behalf of the Company. It covers the offering, giving, receiving, or soliciting of gifts, entertainment, commissions, or any form of advantage in relation to business dealings.

### ANTI-CORRUPTION COMPLIANCE

The Company strictly prohibits all forms of bribery and corruption. Employees and third parties acting on behalf of the Company must not offer, give, or accept any bribes or improper payments, whether directly or indirectly. This includes payments made to Government Officials, customers, or business partners to gain an unfair business advantage.

### BUSINESS ETHICS

The Company expects all employees and associates to act with integrity, honesty, and transparency in all business transactions. Conflicts of interest must be avoided, and any potential conflict must be disclosed to management. Compliance with all local, national, and international laws is mandatory.

### PAYMENT OF COMMISSIONS

The Company will only pay commissions to agents or third parties that are legitimate, transparent, and reasonable in relation to the services provided. No commission should be paid where it is suspected that any that any portion may be used for corrupt purposes or to influence business decisions.

### GIFTS AND ENTERTAINMENT

Gifts, entertainment, and hospitality offered or received should be appropriate, reasonable, and aligned with local customs and business practices. They should never be offered or accepted if they could create a perception of impropriety or an expectation of receiving preferential treatment. All gifts and entertainment provided to Government Officials must comply with local laws and be reported to the compliance officer.

### REPORTING AND COMPLIANCE

Any employee or third party who becomes aware of a potential violation of this policy is required to report it immediately. The Company will take appropriate action to investigate and address any violations. No retaliatory action will be taken against individuals who report potential violations in good faith.

## CONSEQUENCES OF VIOLATIONS

Violations of this policy may result in disciplinary action, including termination of employment or contract, and may also result in legal proceedings or criminal charges under applicable laws.

## EMPLOYMENT PRACTICES

Business partners shall only use recruiters (agencies) that comply with local labor laws. Partners and recruiters acting on their behalf shall not: (i) withhold or prevent a worker from accessing his or her identity or immigration documents, such as passports, work permits or drivers' licenses; or (ii) charge workers recruitment or placement fees, or require workers to make deposits or participate in savings programs (unless legally required).

## FAIR TREATMENT

Business partners shall provide a workplace free of harsh and inhumane treatment, including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, or verbal abuses of workers. Partners shall also provide a workplace free of harassment and discrimination. Discrimination for reasons such as race, color, gender, age, religion, national origin, ancestry, ethnicity, disability, sexual orientation, gender identity, gender expression, genetic information, citizenship status, marital status, military/veteran status or any other characteristic and respect.

## PRIVACY & DATA PROTECTION

Business partners shall respect individuals in a manner consistent with the rights to privacy and data protection. They shall at all times use information about people appropriately for necessary business purposes and protect it from misuse in order to prevent harm to individuals such as discrimination, stigmatization or other damage to reputation and personal dignity, impact on physical integrity, fraud, financial loss or identity theft.

## LEGAL & CUSTOMER REQUIREMENTS

Business partners shall identify and comply with applicable laws, regulations and standards and relevant customer requirements, and address identified gaps in a responsible and timely fashion.

## RISK ASSESSMENT & RISK MANAGEMENT

Business partners shall have mechanisms to assess and manage risks in all areas addressed by this document.

## DOCUMENTATION

Business partners shall maintain documentation necessary to demonstrate conformance with these expectations, and compliance with applicable regulations.

## SUPPLIER SELECTION & MONITORING

Business partners shall apply the principles outlined in this document when selecting their own partners and suppliers. Partners shall have or put in place systems to monitor their supplier and subcontractor compliance.

## ACCURACY OF BUSINESS RECORDS

All financial books and records must conform to generally accepted accounting principles. Records must be complete and accurate in all material respects. Records must be legible, transparent and reflect actual transactions and payments. Partners will not use any “off the books” or similar funds.

## IDENTIFICATION OF CONCERNS

Business partners shall encourage all workers to report concerns or suspected illegal activities without threat of reprisal, intimidation or harassment, and shall investigate and take corrective action if needed. Partners shall provide workers with information on how to confidentially report concerns, and shall ensure that reporting workers are protected from retaliation. Anonymous reporting channels should be provided where permitted by law.

## CONCLUSION

The Company is committed to maintaining a culture of integrity and compliance with all anti-corruption and business ethics regulations. All employees and business partners are expected to adhere to this policy and promote ethical conduct in all business dealings.