

Rimini Street

Trade Compliance Policy

Policy Statement

Rimini Street, Inc. (the “**Company**”) is dedicated to fostering and maintaining the highest ethical standards. We expect all our employees, contractors, and other staff to dedicate themselves to ensuring that the Company is fully compliant with applicable sanctions, export control, and other trade laws, including the regulations administered by the U.S. Treasury Department’s Office of Foreign Assets Control (“**OFAC**”), the Export Administration Regulations (“**EAR**”) administered by the U.S. Commerce Department Bureau of Industry and Security (“**BIS**”), and all other sanctions laws in jurisdictions in which the Company is active (collectively, “Trade Laws”). This Trade Compliance Policy (this “Trade Policy”) provides guidance to the Company’s officers, directors and employees (“team members”), as well as its distributors, consultants, agents, contractors, business partners, and any other third-party representatives acting on the Company’s behalf regarding applicable Trade Laws as well as establishes the procedures that we must follow to ensure that the Company’s practices meet or exceed all applicable legal and ethical standards.

The Company will require annual certifications from all team members certifying that they have read and understand this Trade Policy. The Company does not expect its team members and agents to become experts in compliance with the Trade Laws. However, the Company expects and requires all those subject to its governance to seek guidance regarding any conduct that may violate Trade Laws. Please consult with the Trade Compliance Officer or the Ethics & Compliance Practice Group of the Company’s Legal Department (“Legal Ethics & Compliance”) should you have any questions. Contact information for the Trade Compliance Officer and Legal Ethics & Compliance can be found in Section 9 (Suspected Violations Reporting) below.

Compliance with these rules is mandatory, not voluntary. No team member has the authority to act contrary to this Trade Policy, nor direct, authorize, or condone violations of this Trade Policy by any other team member. Any team member who violates this Trade Policy or any applicable Trade Laws, or who knowingly permits another to do so, will be subject to appropriate disciplinary action, up to and including termination.

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1 Policy Organization, Personnel, and Responsibilities

1.1 Personnel Responsible for This Trade Policy

The following personnel are responsible for the development, maintenance, and compliance with this Trade Policy:

- Group Vice President and Associate General Counsel, Ethics & Compliance shall serve as the Trade Compliance Officer
- Corporate Counsel, Ethics & Compliance

1.2 Duties of the Trade Compliance Officer

The duties and responsibilities of the Trade Compliance Officer will include:

- Implementing, maintaining, and updating this Trade Policy;
- Training new and current Company personnel subject to this Trade Policy;
- Identifying any potential export licensing or notice requirements;
- Resolving licensing issues and communicating with licensing authorities;
- Reviewing and implementing all terms and conditions of authorizations issued by a governmental authority;
- Screening applicable sanctions lists, evaluating and documenting results, and making appropriate decisions about the results;
- Maintaining Company records related to this Trade Policy;
- Investigating and authoring disclosures as needed;
- Evaluating the effectiveness of this Trade Policy via Annual Audits; and
- Serving as the point of contact for all questions or inquiries from counterparties or governmental authorities related to Company's compliance with Trade Laws.

1.3 Related Policies

- Code of Business Conduct and Ethics
- Global Anti-Corruption Policy

2 Overview of Economic Sanctions

2.1 Summary

Economic sanctions refer to legal restrictions that governments impose on transactions with specific parties or entire jurisdictions (*i.e.*, embargoes) to change the behavior of individuals, countries, or regimes, to discourage politically undesirable outcomes such as terrorist attacks, human rights abuses, narcotics trafficking, and the proliferation of weapons of mass destruction.

In practice, sanctions involve prohibitions or restrictions on specific activities. These may include prohibitions on doing business or engaging in specified transactions with particular businesses, industry sectors, individuals, governments, or regimes. Sometimes sanctions are comprehensive, meaning they prohibit all trade activities between countries, without making any distinction in the type of transactions or counterparties involved.

2.2 Comprehensive Sanctions

Comprehensive sanctions, often referred to as embargos, ban virtually all trade with sanctioned jurisdictions absent government authorization. Jurisdictions currently subject to comprehensive sanctions are: Crimea; Cuba; Iran; North Korea; and Syria.

It is Company policy not to engage in any activities with any sanctioned country or for the benefit of any sanctioned country.

2.3 List-Based Sanctions and Sanctioned Parties

The most common type of sanctions are “list-based” sanctions. List-based sanctions generally involve a government specifying criteria describing behavior the government wants to discourage (e.g., “government officials misappropriating state assets” or “persons engaging in cyber-enabled activities to undermine election processes”). When such persons are identified, the government may “designate” them by publicly identifying such persons on a sanctions list.

Different sanctions lists carry different restrictions. The most common type of sanctioned person is called a “Specially Designated National” or “SDN.” Under most sanctioned regimes, any person that is owned 50 percent or more by one or more SDNs must also be treated as an SDN. In general, once someone is designated as an SDN, it becomes illegal for U.S. persons to engage in any dealings with that person. Therefore, as a matter of policy, the Company does not engage or otherwise deal with SDNs. To avoid dealing with SDNs, the Company performs third party due diligence as discussed in [Section 5](#) of this Trade Policy.

As a U.S. company, Rimini Street must generally “block” or “reject” transactions involving SDNs or other sanctioned parties and report such actions to OFAC. If one of the Company’s counterparties is designated as an SDN, the Company must generally “block” (i.e., freeze) any of that SDN’s property in the Company’s possession or control (including payments received from the SDN) and report the blocking to OFAC. Some sanctioned persons are not subject to blocking sanctions, but nonetheless the Company is prohibited from dealing with them. In such cases, the Company must “reject” any potential transactions with such parties and report the rejection to OFAC. Any block or rejected transaction must be reported to OFAC within 10 business days of the event.

It is Company policy not to engage in any activities with any SDN.

2.4 Sectoral Sanctions

OFAC also administers a Sectoral Sanctions Identification (“SSI”) list covering entities subject to sectoral sanctions. Although general commercial transactions with SSI list entities are permitted, it is prohibited for U.S. persons to extend certain debt (credit) to, and/or acquire equity in, an SSI list entity. For certain SSI list entities, the limitation on the debt extension can be as short as 14 days.

Any transaction involving an SSI list entity shall be subject to the prior written approval of the Trade Compliance Officer or designee.

2.5 Why is Compliance with Sanctions Important?

Sanctions are usually implemented under the national security authorities of the issuing governments. These authorities are often “strict liability” meaning that even accidental violations may result in liability for the Company, and potentially its team members in their individual capacity. This liability can be severe. The fines for the most common sanctions programs are over \$300,000 per violation, or twice the value of the transactions, *whichever is greater*. Willful violations of these rules may result in fines of up to \$1,000,000 or 20 years in prison, *or both*. Therefore, it is essential each Company team member complies with these rules.

2.6 Sanctions Authorities and References

Sanctions are based on the foreign policy of the issuing government. This means that as the foreign policy of the issuing government changes, the sanctions may also change. To ensure the Company has access to the most recent updates, please review the following authorities and their associated websites.

2.6.1 United States (U.S.)

In the United States, the primary sanctions authority is the U.S. Treasury Department's Office of Foreign Assets Control ("OFAC"). The most well-known sanctions list is OFAC's "List of Specially Designated Nationals and Blocked Persons," or SDN List. Parties on the SDN List are cut off from the U.S. financial system and lose access to any assets they have in the United States. OFAC provides a free sanctions list search tool on its website at:

<https://www.treasury.gov/resource-center/sanctions/Pages/default.aspx>.

2.6.2 European Union (EU)

In the EU, the authority to implement sanctions is delegated to the EU member states. The EU provides an interactive online map of where its sanctions apply at <https://sanctionsmap.eu/#/main>. The EU also maintains a consolidated list of sanctioned individuals, entities, and organizations similar to OFAC's SDN List. You may find the EU Consolidated List at:

<https://webgate.ec.europa.eu/europeaid/fsd/fsf/public/files/pdfFullSanctionsList/content?token=dG9rZW4tMjAxNw>

2.6.3 United Kingdom (UK)

The primary sanctions authority in the UK is the Office of Financial Sanctions Implementation ("OFSI"). The UK's list of sanctions targets is located at:

<https://www.gov.uk/government/publications/financial-sanctions-consolidated-list-of-targets>.

2.6.4 United Nations (UN)

The UN Security Council can call upon UN members to impose sanctions on parties or countries to maintain or restore international peace and security. The UN consolidated list of sanctioned parties is located at:

<https://www.un.org/securitycouncil/content/un-sc-consolidated-list>.

3 Export Controls

3.1 Summary

U.S. trade laws exist to protect the United States by prohibiting the distribution of commodities, hardware, software and technologies (collectively referred to in the EAR as "items") that could compromise U.S. national security or policy objectives. They also prohibit dealings with parties that may have violated the EAR and other malign actors who the U.S. Government has determined pose a threat to U.S. national security. The United States is a member of the Wassenaar Arrangement, consisting of numerous allied countries that seek to create uniformity on export control applicable to dual-use items.

3.2 Export Review Policy and Prior Approval

As a service provider, the Company generally does not engage in export activity. However, in the course of providing its services, the Company may develop and send software code to a client, which would constitute an “export” under the EAR if the client is located outside the United States. Because the Company’s services are tied to a client’s enterprise applications, any code that is provided is not likely to implicate export licensing requirements.

However, it will be necessary to obtain the prior written approval of the Trade Compliance Officer prior to providing a client any software code that:

- (i) contains or calls upon encryption functionality; or
- (ii) is not directly related to the enterprise applications of the client that are being serviced.

In addition, it will also be necessary to obtain the prior written approval of the Trade Compliance Officer for any item that is to be exported to another Company office or to any other third party (other than to clients as described above).

3.3 EAR Sanctioned Parties

It is Company policy not to enter into contracts, conduct business, exchange information, or otherwise participate, directly or indirectly, in any activities involving items subject to the EAR with parties that are subject to sanctions under the EAR, including parties on the BIS Entity List, Denied Persons List, and Unverified List (see <https://www.bis.doc.gov/index.php/policy-guidance/lists-of-parties-of-concern>). Any person or entity appearing on such BIS sanctioned party lists are referred to as a “**Denied Party.**”

3.4 Export Violation Penalties

Penalties for violations of export control laws can be severe. As with OFAC violations, BIS can impose monetary penalties of over \$300,000 per violation, or twice the value of the transactions, *whichever is greater*. Willful violations of these rules may result in fines of up to \$1,000,000 or 20 years in prison, *or both*. BIS also has the authority to deny a company export privileges. Therefore, it is essential each Company team member complies with all applicable export control requirements.

4 Anti-Boycott Compliance

4.1 Anti-boycott Provisions and Compliance

U.S. anti-boycott laws, included in the EAR and subject to the jurisdiction of the Office of Antiboycott Compliance (“**OAC**”), prohibit U.S. firms from participating in or furthering foreign boycotts that the United States does not sanction. Although primarily directed at the Arab League boycott of Israel, the anti-boycott laws apply to all boycotts imposed by a foreign country against another country that are not sanctioned by the U.S. Government.

4.2 Prohibited Activities

Activities prohibited by U.S. anti-boycott laws include, but are not limited to, the following:

- Agreements to refuse or actual refusals to do business in Israel or with companies blacklisted by the Arab League;

- Agreements to discriminate or actual discrimination against other persons based on race, religion, sex, national origin or nationality;
- Agreements to furnish or actually furnishing information about business relationships with or in Israel or with blacklisted companies;
- Agreements to furnish or the actual furnishing of information about the race, religion, sex or national origin of another person;
- Furnishing information about business relationships with Israel or blacklisted persons;
- Implementing letters of credit containing prohibited boycott terms or conditions; and
- Taking any action with the intent to evade the antiboycott prohibitions.

It is a violation of the anti-boycott laws to agree to any such prohibited conduct or provide any information in furtherance of the unsanctioned boycott. In addition, any prohibited boycott request must be reported to OAC within 30 days of the end of the calendar quarter in which the request was made.

Prohibited boycott prohibitions often appear in RFPs and transaction documents such as contracts. Examples of such prohibited clauses and general information on the EAR antiboycott prohibitions are available on the OAC webpage at <https://www.bis.doc.gov/index.php/enforcement/oac>.

5 Third-Party Due Diligence

5.1 Summary

The most important component of trade compliance is Third-Party Due Diligence. Third-Party Due Diligence starts when the Company is considering whether to enter into a contractual relationship with a counterparty, or deal with them at all. At this stage, and before any documents are executed, the Company must obtain the information necessary to determine whether the Company may engage with a counterparty without violating any Trade Laws. Next, the Company uses this information to perform Sanctions Screening. Sanctions Screening (including related diligence) allows the Company to assess the risks of engaging or transacting with a counterparty. This process includes identifying and following up on “red flags” that suggest a party is sanctioned. Regardless of the outcome of Sanctions Screening, the Company must ensure it keeps records of all due diligence it performs.

5.2 Onboarding and Intake

Before engaging in any new contractual relationship or transaction, the Company must perform appropriate due diligence to ensure its counterparties will not expose the Company to sanctions liability. This process starts at the negotiation stage of the relationship. When considering a new relationship with a counterparty, the Company must obtain the following information from that counterparty:

- Information indicating who the counterparty’s beneficial owners are (if an entity);
- Whether the counterparty has any ties to government officials and who those officials are;
- The jurisdiction under which the counterparty is incorporated (if an entity);
- Where the counterparty primarily operates; and
- The economic sector the counterparty operates in.

Once the information above is obtained, the Trade Compliance Officer performs Sanctions Screening as described below.

5.3 Counterparty Screening

As a matter of policy, the Company screens all counterparties and their ultimate beneficial owners, and all transactions against applicable sanctions lists, including the OFAC and BIS lists, using screening software. The Trade Compliance Officer shall perform such screening prior to the Company engaging in any contractual relationship with a counterparty and before engaging in any transaction involving a counterparty located outside the United States. The Trade Compliance Officer shall also examine whether the proposed transaction presents any potential red flags or reputational concerns.

If the screening yields a potential hit with a sanctioned party or other trade risk, the Trade Compliance Officer shall undertake further investigations and may, in their sole discretion, determine whether to move forward with the proposed relationship or transaction. To the extent the Trade Compliance Officer determines a proposed transaction does not pose a sanctions or trade risk, the Trade Compliance Officer shall inform you that the proposed transaction may proceed, but may impose conditions, such as requiring that the screened party be monitored going forward.

To the extent the Trade Compliance Officer determines the proposed transaction does pose an actual trade risk, the Trade Compliance Officer shall analyze and consider whether such risk can be mitigated by any potential mitigating factors. **You may not continue with the proposed transaction without express written authorization from the Trade Compliance Officer.**

5.4 Examples of Sanctions “Red Flags”

5.4.1 Geographic Locations

Certain countries and regions pose greater trade risks than others. If a potential counterparty, its customers, or its suppliers are located in one of the following jurisdictions, it shall constitute a “red flag” under this Trade Policy and shall be immediately reported to the Trade Compliance Officer:

China, Iran, North Korea, Russia, Venezuela

If a potential counterparty, its customers, or its suppliers are located in one of the following jurisdictions, you should consider that party a higher-than-normal trade risk, and conduct additional due diligence to ensure that it is not sanctioned:

Afghanistan, Belarus, Bosnia and Herzegovina, Myanmar/Burma, Burundi, Central African Republic, Colombia, Democratic Republic of Congo, El Salvador, Guatemala, Guinea-Bissau, Honduras, Iraq, Lebanon, Liberia, Libya, Mali, Nicaragua, Pakistan, Serbia, Sierra Leone, Somalia, South Sudan, Sudan, United Arab Emirates, Yemen, Zimbabwe

If you discover a counterparty is (1) located or has activities in, or any other connections with, any of these countries and (2) there is at least one other non-geographic factor suggesting that counterparty presents sanctions or other trade risk, it shall constitute a “red flag” under this Trade Policy and shall be immediately reported to the Trade Compliance Officer.

5.4.2 Industries

Certain industries represent a greater trade risk because sanctioned persons are heavily involved in them, or they are often used for sanctions evasion. Higher risk industries include:

Energy, Mining, Financial Services, Logistics and Shipping, Defense

However, sanctions and trade risks can occur in almost any industry, so it is essential to screen every party and transaction. If you discover a counterparty (1) operates in, or has any other connections with, these industries and (2) there is at least one other non-industry factor suggesting that the counterparty presents trade risk, it shall constitute a “red flag” under this Trade Policy and shall be immediately reported to the Trade Compliance Officer.

5.4.3 Concealed Ownership

Many sanctioned parties take steps to conceal the fact that they are sanctioned. Therefore, if a counterparty refuses to disclose or is dishonest about who their customers, suppliers, or owners are, it shall constitute a “red flag” under this Trade Policy and shall be immediately reported to the Trade Compliance Officer.

For reference, potential sanctions “red flags” in this case may include:

- Lack of representations and warranties:
 - The relevant third party does not agree to comply with the Company’s sanctions compliance policies and related policies.
 - The relevant third party does not agree to comply with trade-related representations or warranties in contracts or other agreements.
- Lack of information/false information:
 - There is insufficient information about the beneficial owner(s) of a company.
 - The third party uses shell companies.
 - The third party’s ownership structure is overly complicated for no discernible reason.
 - The third party provides insufficient, false, or suspicious information.
 - There is evidence that transaction documentation has been manipulated or falsified.

If you have any questions about this Trade Policy, please seek guidance from the Trade Compliance Officer before acting.

6 Training

6.1 Policy Statement

The Company understands that its team members, contractors, and other persons acting on its behalf are the first line of defense in preventing sanctions or other trade violations. To ensure the Company team members or others acting on its behalf understand their sanctions and related obligations, the Company requires all such persons to receive appropriate training both at onboarding and annually thereafter.

6.2 Training Requirements

When the Company onboards a new team member, contractor, or other person acting on the Company’s behalf, the Company shall train that person on the requirements of this Trade Policy. Such training may be an in-person briefing, discussion, or a more formal presentation as the Trade Compliance Officer deems appropriate. The Company shall also provide such training to all its team members, contractors, or other staff on an annual basis to ensure they know how to spot sanctions and related issues. Both the onboarding and the annual trainings shall be the responsibility of the Trade Compliance Officer or their designee.

6.3 Documentation

All training sessions shall be documented, including a list of attendees, training date(s), materials provided, and topics covered in a training log. The Trade Compliance Officer or their designee will maintain copies and logs of training materials, attendance, and other relevant documentation.

7 Recordkeeping and Reporting

7.1 Recordkeeping Responsibilities

The Trade Compliance Officer is responsible for ensuring the maintenance of records related to economic sanctions and Third-Party Due Diligence, in accordance with this Trade Policy. These records will generally include:

- All documents and records associated with Third-Party Due Diligence, including Sanctions Screening, “red flags” review, and related materials;
- Any government authorizations or licenses;
- Any reports or disclosures filed with any governmental authorities; and
- Whistleblower reports.

This Trade Policy is designed to help the Company comply with all applicable Trade Laws. The Company must ensure it keeps records of all Third-Party Due Diligence, and government licenses and authorizations it relies on. The Company must also ensure it keeps records demonstrating compliance with this Trade Policy, including whistleblower reports, reports of suspected trade violations, Trainings, Annual Audits, and Risk Assessments.

7.2 Reporting

From time to time, the Company may rely on government licenses and authorizations to engage in its operations. These licenses and authorizations may require the Company to report certain transactions to governmental authorities. It is Company policy to comply with all such reporting requirements. As noted above, as a U.S. company, Rimini Street must generally report all transactions it “blocks” or “rejects” due to the involvement of sanctioned parties or jurisdictions to OFAC within 10 business days.

7.3 Government Requests for Documents

If OFAC, BIS, or any other governmental agency makes a formal or informal request for any of the Company’s records, the Company team member receiving such request shall immediately notify the Trade Compliance Officer. Documents pertaining to the requested records may not be destroyed or disposed of without the express written authorization of the Trade Compliance Officer.

7.4 Retention Period

The Trade Compliance Officer shall ensure all records related to this Trade Policy are retained for a period of at least five (5) years.

8 Testing and Auditing

8.1 Summary

The Company understands that Trade Laws are dynamic and subject to change. To ensure this Trade Policy responds to the changing regulatory landscape, the Trade Compliance Officer shall perform Annual Audits of its compliance processes to identify deficiencies. The Trade Compliance Officer shall also perform annual Risk Assessments to review whether changes to Trade Laws or the Company activities require the Company to change its trade compliance procedures. Finally, to the extent the Annual Audit and/or Risk Assessment uncover deficiencies in this Trade Policy, the Trade Compliance Officer shall update this Trade Policy to cure those deficiencies.

8.2 Annual Audit

The Trade Compliance Officer may conduct an internal audit or designate an independent auditor to test compliance with this Trade Policy. However, any outside independent audit shall be completed within the first two (2) years of implementing this Trade Policy. Such audit may be accomplished by selecting an appropriate sample of transactions for review to ensure that the transactions have been processed in accordance with the provisions of this Trade Policy. As part of the audit, the auditor shall also verify that records are retained in accordance with this Trade Policy and applicable laws. If systemic problems are identified, the audit will be expanded to determine the extent of the problem.

The auditor or the Trade Compliance Officer will then prepare a written report detailing the audit. The report should, at a minimum, contain a list of the transactions reviewed and the results of the audit. The Trade Compliance Officer will take appropriate action to correct any problems identified during the audit.

8.3 Risk Assessment

After performing the Annual Audit, the Trade Compliance Officer shall annually review the Company's operations to determine the sanctions and trade risks presented to the Company. These risks may not change from year to year, but when the Company deploys its products and services in new locations, the Trade Compliance Officer shall ensure any new risks related to those locations are adequately mitigated by this Trade Policy.

8.4 Trade Policy Updates

After performing its Annual Audit and Risk Assessment, the Trade Compliance Officer shall update this Trade Policy as necessary to ensure it reasonably addresses all identified risks. The Trade Compliance Officer shall record all program updates made in the last five (5) years.

9 Suspected Violation Reporting

If you suspect or become aware of or have reason to believe the Company, any team member, or contractor may have violated this Trade Policy or applicable Trade Laws you should immediately report the situation to the Trade Compliance Officer or Legal Ethics & Compliance at Ethics@riministreet.com. Any manager or human resources representative who receives a report of a potential violation of this Trade Policy or the law must immediately inform the Trade Compliance Officer or Legal Ethics & Compliance. You can also ask questions, raise concerns, or make reports of suspected compliance violations by contacting the Trade Compliance Officer or the Rimini Street Compliance Helpline:

- By email at Ethics@riministreet.com

- By phone using a special toll-free telephone number based on the country from which you are calling. In the United States, please call 844-754-3342. For a list of international country phone numbers, see our Compliance Helpline section at www.RiminiStreet-ComplianceHelpline.com.
- By web available at www.RiminiStreet-ComplianceHelpline.com.

The Rimini Street Compliance Helpline is managed by an outside company and is available 24 hours a day, seven days a week. Where allowed by local law, you may make an anonymous report to the Compliance Helpline.

You may also raise the matter directly by contacting the Audit Committee Chair at audit@riministreet.com.

Reports should be factual instead of speculative or conclusory, and should contain as much specific information as possible to allow the persons investigating the report to adequately assess the nature, extent, and urgency of the investigation.

All matters reported will be dealt with in strict confidence. All suspected sanctions and trade violations will be vigorously and promptly investigated, and violations of this Trade Policy or relevant Trade Laws may result in disciplinary action, termination, or further legal action. Suspected violations may also be reported to the relevant authorities, and such authorities may investigate suspected offenders, who could face civil or criminal fines, penalties, and/or imprisonment as a result.

Company will not tolerate retaliation against any individual who submits a good faith report of a suspected violation of law or this Trade Policy. Any employee who is the target of retaliation should promptly report it to the Trade Compliance Officer or Legal Ethics & Compliance, who shall ensure that such reports may be made confidentially and that all such reports are thoroughly investigated.