

CODE OF ETHICS AND BUSINESS CONDUCT

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MESSAGE FROM OUR CEO



Doing things right is one of our most important values at **RECOM TECHNOLOGIES GROUP**. We are committed to providing high-quality services and products to meet the interests and satisfaction of our consumers. We provide value for money and deliver the best customer service and experience.

As we aim to achieve our dual goals of exceptional quality and fair price, we must always be mindful of our commitment to act with the highest standard of integrity in all of our business decisions and actions. Internally, we are one team, accountable and respectful among ourselves and towards others. Externally, the respect for human rights, labor laws, fair competition, sustainability and environmental considerations should

be the guiding principles in our choices for outsourcing, procurement and end users.

Doing things right is not a choice at Recom Technologies . Working here means making a commitment to uphold our company values and following the code of conduct outlined in this document.

Thank you for adhering to our values and helping us to be the best in what we do.

HAMLET TUNYAN
CEO
RECOM TECHNOLOGIES

A. INTRODUCTION

Recom Technologies has a firm obligation to ethical and legal conduct in all of its business activities. In order to uphold this commitment and protect our reputation, we have a shared responsibility to understand all applicable standards and expected behaviours.

The purpose of this Code of Ethics and Conduct ("Code") is to conduct the business of Recom Technologies Group ("Recom Technologies") in accordance with the applicable laws, regulations, rules and with the highest professional standard of ethics and values. The Code constitutes a fundamental instrument that provides the information to help guide us in our day-to-day activities. Therefore, the Code is not intended to give answers to every question, rather, it is a starting point to give you guidance and help you find the correct resource in case more information is needed.

This Code is a statement of certain core principles, ethics, values, policies and procedures that govern Management, Directors, Contractors, and Employees in the conduct of business with Recom Technologies.

This Code applies to any entity controlled by Recom Technologies and other entities not controlled by Recom Technologies which are expected to implement and apply all of the same legal requirements and principles contained in this Code.

Similarly, it is expected that distributors, agents, suppliers and other business partners who work with and on behalf of Recom Technologies to comply with the standards of this Code.

Any entity or business partner that does not adopt such rules and principles will be subject to further scrutiny and appropriate corrective actions.

B. ETHICAL PRINCIPLES AND CORE VALUES

I. Our ethical principles define the frame of reference in which Recom Technologies carry out business, and play a significant role in building a corporate environment based on trust and integrity. These values help each employee to ask himself the right attitude to adopt, especially when faced with delicate circumstances that he may have to deal with.

The core values are as follows: respecting diversity, contributing to a safe and healthy working environment, refusing all harassment and discrimination, selecting and treating suppliers objectively and fairly, developing transparent business relations, respecting commitments to partners, refraining from any agreement or unfair practice, ensuring the safety of people and property, protecting Recom Technologies resources and assets, safeguarding confidentiality, preserving the environment, being honest, individually and collectively, providing reliable and faithful reporting, avoiding conflicts of interest and refusing all forms of corruption.

II. The ethical principles of Recom Technologies are based on:

- a. The Conventions of the International Labour Organization (ILO).
- b. The International Bill of Human Rights, including the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, and the International Covenant on Economic, Social and Cultural Rights.
- c. The Convention of the Organization for Economic Co-operation and Development (OECD) on Combating Bribery of Foreign Public Officials in International Business Transactions.
- d. The OECD Guidelines for Multinational Enterprises.
- e. The United Nations Convention against Corruption.
- f. The Uyghur Forced Labor Prevention Act (UFLPA).

C. DECISION MAKING

I. Introduction

When making a decision, ask yourself the following:

- Is it legal?
- Does it comply with the code?
- Does it reflect our company values and ethics?

- Does it respect the rights of others?
- If you are unsure about any of the answers, ask.

II. Reporting/Speaking Up

Recom Technologies encourages all employees to ask questions and raise issues without fear of retaliation and is committed to treating reports seriously and investigating them thoroughly.

Employees must report suspected unethical, illegal or suspicious behavior immediately. Recom Technologies does not tolerate retaliation against anyone who makes a good faith report of suspected misconduct or otherwise assists with an investigation or audit.

To report a concern employees are strongly encouraged to talk to their Manager or contact Human Resources Department.

III. No Retaliation

Employees who report a concern in good faith cannot be subjected to any adverse employment action including but not limited to:

- Unfair dismissal, demotion or suspension
- Unfair denial of a promotion, transfer or other employment benefit
- Bullying and harassment, either in person or online
- Exclusionary behavior
- Any other behavior that singles out the person unfairly

D. RESPECT AND INCLUSIVITY

I. Introduction

Recom Technologies strives to maintain a harmonious workplace for its employees, by fostering a truly balanced work ethic, ensuring fair and stable working conditions, and encouraging employees' personal growth. To achieve this, Recom Technologies will use its best efforts to comply with all labour and employment laws and regulations of the countries where it has an establishment and conducts operations.

II. Equal Opportunity

Recom Technologies is committed to equal opportunity in employment and to fostering diversity in the workforce. All policies and practices regarding hiring and other aspects of the employment relationship require that there be no discrimination because of race, color, religion, age, gender, sexual orientation, gender identity, national origin, disability, veteran status, genetic information, or pregnancy, and other factors that may be covered by applicable laws.

Recom Technologies acknowledges that diversity in its workforce is a valuable asset, and strives to provide an inclusive work environment in which different ideas, perspectives, and beliefs are respected. Violations of equal opportunity policies may result in discipline, up to and including termination.

III. Harassment

Recom Technologies treats all employees with dignity and respect at all times. Any type of harassment, including physical, sexual, verbal or other, is prohibited and can result in disciplinary action up to, and including, contract termination. Harassment may include actions, language, written words or objects that create an intimidating or hostile work environment. Employees of Recom Technologies must refrain from:

- Yelling at or humiliating someone
- Physical violence or intimidation
- Unwanted sexual advances, invitations or comments
- Visual displays such as derogatory or sexually-oriented pictures or gestures
- Physical conduct including assault or unwanted touching
- Threats or demands to submit to sexual requests as a condition of employment or to avoid negative consequences

IV. Bullying

Recom Technologies is bound to ensure that its directors, managers, employees, and contractors work in safe and respectful environment that is free of bullying. To this end, employees of Recom Technologies are prohibited from engaging to the below behaviours:

- Spreading malicious rumor or gossip
- Excluding or isolating someone socially
- Establishing impossible deliverables
- Withholding necessary information or purposefully giving the wrong information
- Intimidating someone
- Impeding someone's work
- Unfairly denying training, leave or promotion
- Constantly changing work guidelines
- Sending offensive jokes or emails
- Criticizing or belittling someone constantly
- Tampering with a person's personal belongings or work equipment

V. Freedom of Association and Collective Bargaining

Recom Technologies recognizes and respects the right of employees to exercise their right of freedom association, as per applicable legislation. It is followed that Recom Technologies respects the rights of their employees to choose or not choose collective bargaining.

VI. Forced Labor and Human Trafficking

Recom Technologies prohibits the use of all forms of compulsory labor, including prison labor, indentured labor, bonded labor, slave labor and any form of human trafficking. We further commit to work with our global supply chain to create conditions so that no workers pay for their job and workers have control of their travel documents and have full freedom of movement. At Recom Technologies we ensure all workers are informed, in a language they understand, of the basic terms of their employment before leaving their country of origin.

VII. Child Labor

Recom Technologies will never employ individuals in violation of the local mandatory school age or who have not reached legal employment age in the respective countries where they operate. Moreover, in no case will Recom Technologies or its suppliers employ workers under the age of 15, except for child actors and models employed in advertising or media who are protected by applicable child employment requirements.

E. PREVENTING CORRUPTION

I. Introduction

Recom Technologies is committed to ensuring that it, along with its directors and employees as well as third parties who may supply or provide professional services on its behalf, act in compliance with all applicable laws of the various jurisdictions where its branded products and services are offered, to the extent that such laws are applicable.

A violation of relevant anti-corruption laws can lead to severe civil and criminal penalties and reputational harm to Recom Technologies. To ensure compliance with these laws, Recom Technologies has adopted the following rules which, subject to and in accordance with any applicable local laws and regulatory requirements, apply to all employees of Recom Technologies and to each agent, distributor, representative, consultant, and independent contractor acting on behalf of Recom Technologies.

II. Prohibition of Bribery

a. Government Bribery

Recom Technologies and its employees are prohibited from giving, promising, offering, or authorizing payment of anything of value to any government official to obtain or retain business, to secure some other improper advantage, or to improperly influence a government official's actions. Additionally,

Recom Technologies associates must also avoid the appearance of improper interactions with government officials.

All directors, officers, employees, suppliers, agents or other third parties acting on behalf of Recom Technologies, no matter where they are located, must comply with anti-corruption laws.

In any event, Recom Technologies does not consent to the commission of any of the above and shall not provide assistance or mediation thereto. In particular, Recom Technologies is extremely careful in its dealings with the public sector. Our accurate books and records of our business transactions demonstrates our transparency.

b. Commercial Bribery

In addition to the prohibitions of bribing government officials discussed above, Recom Technologies prohibits employees from offering or providing corrupt payments and other advantages to or accepting the same from private (non-government) persons and entities. Such payments constitute commercial bribery and are often called "kickbacks."

c. Facilitation Payments

Recom Technologies's prohibition on bribery applies to all improper payments regardless of size or purpose, including "facilitating" (or expediting) payments. Facilitation payments refer to small payments to government officials to expedite or facilitate non-discretionary actions or services, such as winning a tender, obtaining an ordinary license or business or building permits, processing government papers such as visas, customs clearance, providing telephone, power service, or loading or unloading of cargo.

d. Political Contributions

Recom Technologies does not make political contributions. Nonetheless, employees are free to support any political party or entity on a personal level. However, this must be kept separate from our business activities.

III. Anti-money Laundering/Anti-Terrorism Laws

Recom Technologies actively complies with anti-money laundering and anti-terrorism laws. Money laundering is the process of concealing illicit funds by moving them through legitimate businesses to hide their criminal origin.

Employees must never knowingly facilitate money laundering or terrorist financing, and must take steps to prevent inadvertent use of the company's business activities for these purposes. Employees are required to immediately report any unusual or suspicious activities or transactions such as:

- attempted payments in cash or from an unusual financing source
- unusually complex deals that do not reflect a real business purpose
- attempts to evade record-keeping or reporting requirements

IV. Gifts and Entertainment

While gifts and entertainment among business associates can be appropriate ways to strengthen ties and build goodwill, they also have the potential to create the perception that business decisions are influenced by them. Recom Technologies is committed to winning business only on the merits of its products and services, and complies with all legal requirements for giving and receiving gifts and entertainment.

Employees are required to:

- Use sound judgment and comply with the law, regarding gifts and other benefits.
- Never allow gifts, entertainment or other personal benefits to influence decisions or undermine the integrity of business relationships.
- Never accept gifts or entertainment that are illegal, immoral or would reflect negatively on the company.
- Never accept cash, cash equivalents, stocks or other securities.

Employees may accept occasional unsolicited personal gifts of nominal value such as promotional items and may provide the same to customers and business partners.

When in doubt, employees should check with the compliance officer before giving or receiving anything of value.

V. Accurate Records and Accounting

All documents, databases, voice messages, mobile device messages, computer documents, files and photos are records of Recom Technologies.

Employees are required to:

- Record all transactions accurately, completely and promptly
- Only perform transactions, such as buying, selling or transferring goods/ assets, for which they are authorised
- Ensure transactions they approve are legitimate and based on valid documentation
- Retain records that may be relevant to any ongoing audit, litigation or regulatory investigation, even if they exceed the normal retention period if instructed to do so.
- Co-operate fully, openly and honestly with internal/external auditors, tax authorities, and competition authorities, and other public authorities entitled to carry out inspection at Recom Technologies premises.
- Ensure they are fully aware of all information relevant to their work.

Employees should never:

- Do anything to artificially inflate or shift sales or profit between reporting period
- Create, maintain or procure others to produce or maintain undisclosed or unrecorded accounts, funds or assets
- Conceal, alter or falsify company records, accounts and documents
- Destroy documents in response to, or in anticipation of, an audit or investigation by a regulatory authority.

VI. Conflicts of Interests

A conflict of interests can occur when an employee's personal activities, investments or associations compromises their judgment or ability to act in the company's best interests. Employees should avoid the types of situations that can give rise to conflicts of interests. Employees must not seek gain for themselves or others through misuse of their positions.

It's important for employees to disclose any relationships, associations or activities that could create actual, potential, or even perceived, conflict of interest to their Manager or the Human Resources Department.

F. PROTECTING INFORMATION, IP RIGHTS, AND ASSETS

I. Confidentiality

Confidential information is information about another company that is not in the public domain, has value and could be used for commercial benefit. Confidential information includes all non-public information that might be harmful to the company and its customers and business partners if disclosed. Using or disclosing other companies' confidential information risks being a serious infringement of competition laws and/or trade secrets/intellectual property laws, leading to significant penalties for Recom Technologies and individuals.

Recom Technologies respects the confidential information of third parties, including competitors, suppliers and customers.

In particular, employees should keep as confidential any information related to :

- Customer lists
- Supplier lists
- Pricing information
- Terms of contracts
- Company policies and procedures
- Financial statements
- Marketing plans and strategies
- Trade secrets
- Any other information that could damage Recom Technologies or its customers or suppliers if it was disclosed.

II. Privacy

Recom Technologies complies with the requirements of the country's and international privacy laws and respects the privacy of all individuals including employees and business partners and their personal data. We will collect and use personal data in accordance with our values, applicable laws and with respect for privacy as a human right. Keeping personal information secure is critical to our people, our business and our reputation. We recognize this responsibility and follow the laws requiring us to protect personal information that can identify an individual or which relates to an identifiable individual, also known as personal information.

Recom Technologies and its employees do not disclose any private, personal information of:

- Employees
- Customers
- Suppliers
- Agents
- Distributors
- Contractors
- Third parties

Recom Technologies may collect and process personal data only for purposes strictly related to the purpose for which is collected. Personal data will be processed automatically and/or in paper form and will be stored for no longer than permitted by applicable laws. Personal data shall not be communicated and/or disclosed to third parties other than if appointed as data processor and in the cases allowed by the law.

The data controller of the personal data collected and processed by Recom is available at the following address: dpo@recom-tech.com.

III. Insider Trading

Employees may learn information about the Recom Technologies, associates, clients, business partners or other companies that is not publicly available. It is illegal for any individual to use information obtained in this way for personal gain or to share it with others.

Trading or encouraging others to trade on inside information, or giving it to unauthorised parties, is a criminal offence in many countries: a breach of the applicable laws can lead to fines and/or imprisonment.

Inside (or price sensitive) information means information that is not available to the public and that a reasonable investor would probably consider important in deciding whether to conduct business with Recom Technologies.

Examples of inside information include the following:

- Business results or forecasts for the whole company or for one of our subsidiaries
- A major new product, product claim or product incident/issue
- An acquisition, merger or divestment
- A sizeable restructuring project
- Major developments in litigation cases or in dealings with regulators or governments
- Revisions in dividend policy
- Changes in directors

Employees are required to report suspected insider trading immediately to the ethics and compliance department.

IV. Intellectual Property Rights

Recom Technologies's intellectual property is an invaluable asset built over years of hard work and must be protected at all times. Intellectual property includes our trademarks, brands, domain names, social media accounts, package designs, logos, copyrights, inventions, patents and trade secrets.

Recom Technologies's intellectual property also includes employees' work product. Any work Recom's employees create, in whole or in part, in connection with your duties, and/or using company time, resources or information, belongs to Recom Technologies. For example, inventions, ideas, discoveries, improvements, artwork, processes, designs, software, or any other materials employees may help to create or author in connection with their work for Recom Technologies belongs to it to the extent permitted by law.

Employees should never allow a third party to use, or allow others to use, Recom Technologies's trademarks or other intellectual property without proper authorization and a license agreement that has been approved by the Legal Department. Recom Technologies trademarks should never be used in a degrading, defamatory or otherwise offensive manner.

V. Assets

Recom Technologies assets are essential to us, our work, and our business, and all employees play an important role in making sure they are used properly. Assets include facilities, equipment, computers and information systems, telephones, employee time, confidential and proprietary information, corporate opportunities and company funds. Employees must take care of tangible and intangible assets, using them for business purposes and protecting them from loss, theft, and misuse.

Employees should:

- Not take equipment, tools, parts, or other physical assets belonging to Recom Technologies for personal use, unless permitted in writing by the responsible Manager or Human Resources Department.
- Use Recom Technologies assets properly and protect the confidentiality of our trade secrets and proprietary, confidential and secret information.
- Dispose of any assets (equipment, machinery, tooling, facilities, vehicle parts and components) in line with company guidelines, taking care to protect Recom Technologies intellectual property.

Suspected incidents of fraud, theft, negligence, and waste should be reported to Human Resources Department and Department of Operations.

G. FAIR BUSINESS PRACTICES

I. Fair Competition

Fair competition laws are intended to promote vigorous competition in a free market. It is in our best interest to promote free and open competition. Recom Technologies makes its own business decisions, free from understandings or agreements with competitors or suppliers that restrict competition. While we compete fiercely for new business, relationships with business partners are built upon trust and mutual benefits and compliant with competition/antitrust laws.

Employees are required to:

- Communicate our branded products and services in a manner that is fair and accurate, and that discloses all relevant information
- Familiarize themselves with our fair competition policies and remain aware of the consequences of any violation of policies or laws governing fair competition
- Consult Recom Technologies Legal Department before engaging in any new practice that may affect fair competition
- Use only publicly available information to understand business, customers, competitors, business partners, technology trends, and regulatory proposals and developments
- Advise the Legal Department immediately of possible violations of fair competition practices

Employees should not:

- Act in a manner that could be seen as an attempt to exclude present or potential competitors or to control market prices
- Induce a third party to breach an existing agreement
- Enter into any agreement or understanding – even an informal understanding – with a competitor to set prices on our products and services, divide territories, markets or customers
- Prevent another company from entering the market
- Participate in any form of bid rigging
- Refuse to deal with a customer or supplier for improper reasons
- Boycott another company

II. Trade Controls

Recom Technologies complies with applicable trade control laws and regulations.

These laws and regulations restrict or prohibit sales or other transactions involving certain products, services, software and technologies to certain countries, individuals or entities to secure international peace and security.

Employees involved in the imports - exports must know, understand, and comply with those laws and regulations as well as relevant internal rules and policies applicable to our roles at Recom Technologies.

III. Fair Procurement

Recom Technologies selects its suppliers and contractors on the basis of competitive price, quality, delivery, and other objective standards. We require our suppliers and contractors to adhere to Recom Technologies' ethical values and comply with all applicable Recom policies.

Employees involved in the procurement procedures must strictly observe the applicable sanctions lists and the relevant policies of Recom Technologies. Failure to observe these laws and regulations could expose both Recom Technologies and the employees involved to severe sanctions, including prohibition of future transactions and criminal penalties.

IV. Health and Safety

Recom Technologies conducts business in accordance with applicable health and safety requirements and strives for continuous improvement in its health and safety policies and procedures.

All employees are expected to perform their work in compliance with applicable health and safety laws, regulations, policies and procedures and apply safe work practices at all times in all locations.

Applicable safety and health requirements must be communicated to visitors, customers or contractors at any company location.

Employees are required to immediately report workplace injuries, illnesses or unsafe conditions, including "near-misses."

H. RESPONSIBILITY FOR PRODUCTS AND SERVICES

I. Product Safety

Customers of Recom Technologies rely on our attention to quality. The strength of our brand depends on it. Our products are designed, manufactured, maintained, and commercialized in accordance with external regulations, applicable laws, internal standards and an ongoing focus on meeting customers' expectations.

Recom Technologies invests in technical capabilities and robust controls to perform research, testing, production, and oversight to ensure each part of the production process achieves its aims and satisfies end-users.

Recom Technologies is committed to giving safety instructions and information to customers that is accurate, understandable and prominently displayed. Should an incident or safety problem be reported, we address them promptly by investigating the matter and taking appropriate further actions.

II. Responsible Innovation

Recom Technologies carries out responsible, safe and sustainable research and innovation, which fully respects the concerns and needs of our customers and society. In meeting customers' demand, Recom Technologies' innovations are based on sound science and technology, and reflect high standards and ethical principles.

Recom Technologies has global standards that apply to all research and innovation, including on: the safe and sustainable design of new products, processes and packaging, product and brand development, and open innovation collaborations.

I. WORKING WITH SUPPLIERS

I. Introduction

Recom Technologies works with many suppliers worldwide to fulfill its client engagements. In general, all purchases from suppliers must be negotiated, signed, and managed by Recom Technologies' Procurement Department, unless a delegation is in place.

In this context, Recom Technologies holds that corporate social responsibility should extend to its entire supply chain. This encompasses not only the products and services supplied but also the human rights, ethics and social practices of our suppliers. In accordance with the International Labor Organization Declaration on Fundamental Principles and Rights at Work and with the purpose of protecting

environment and promoting environmental sustainability, in order to prevent and/or avoid that their activities may cause or contribute to cause Human Rights violations, our suppliers are required to comply with the following:

II. Forced Labor: Suppliers shall employ all employees under their own free will with no one being subjected to bonded or forced labor. This policy applies to not only the supplier's business operations but also those of their supplier network with which the company conducts its business. Suppliers are prohibited to procure raw material from banned areas and entities that are in sanction lists.

III. Child Labor: Suppliers will not employ individuals in violation of the local mandatory school age or under the legal employment age in the country where they operate. Moreover, in no case will Suppliers employ workers under age 15, except for child actors and models employed in advertising or media who are protected by applicable child labor requirements.

IV. Harassment: Suppliers will not subject their employees to physical, verbal, sexual, or psychological harassment, nor use corporal or physical punishment to discipline employees.

V. Compensation: Suppliers will comply with applicable compensation laws and regulations, including those relating to minimum wages, overtime premiums, allowances and benefits. Suppliers shall pay at least the legally required compensation or the prevailing industry compensation, whichever is higher.

VI. Working Hours: Suppliers will comply with all applicable laws and regulations regarding working hours. Other than in exceptional circumstances, workers must not work over the legal limits or over regular overtime hours per week. Overtime shall not be requested on a regular basis and must be voluntary.

VII. Non discrimination: Suppliers will not discriminate in hiring, compensation, discipline, termination or retirement, relying on a person's race, color, gender, national origin (or ethnicity), age, religion, disability, sexual orientation, gender identity, veteran status, marital status and any other protected characteristics or beliefs.

VIII. Safety and Health: Suppliers will operate a safe and healthy work environment for their employees. Suppliers must be committed to eliminating unsafe acts and conditions, thereby preventing harm to their workers, customers and the general public. Where applicable, this also applies to housing and eating facilities.

IX. Environment: Recom Technologies believes in doing business with suppliers who share our commitment to protecting the quality of the environment around the world through sound environmental management. Suppliers will comply with all applicable environmental laws and regulations and will promptly develop and implement plans or programs to correct any non-compliant practices. Suppliers shall seek to reduce waste and adopt responsible measures to minimize and mitigate the environmental impact of their operations.

X. Anti-corruption: Suppliers will not pay bribes or engage in corrupt practices in order to advance business interests of Recom Technologies. This includes any direct or indirect offering, promising to pay or authorizing the payment of money or anything of value to local government officials for the purpose of influencing the decision of public officials.

J. BEING SOCIALLY RESPONSIBLE

I. Environment

Recom Technologies is committed to operating in an environmentally responsible manner from the provision of products and services to the operation of its offices and facilities, selection of suppliers and customers and other business activities.

Recom Technologies complies with all applicable environmental laws and regulations as well as self-directed commitments to sustainable practices and environmental protection.

Recom Technologies along with its suppliers shall produce measurable environmental impact reports and conduct ongoing efforts to reduce environmental pollution while increasing sustainability.

II. Community

Recom Technologies is committed to having a positive impact on economic and social welfare in local communities through relationships with our neighbours and civil organisations. Recom Technologies promotes local development by establishing branches around the world, investing in the upgrade of facilities, and striving to bring better education, income and labour conditions to the communities in which we operate.

Recom Technologies respects these communities' rights to voice their needs and concerns and we make efforts to engage with them to address those needs. All Recom Technologies employees are encouraged to engage in communities' needs assistance with their personal contributions, in-kind donations and volunteer efforts.

III. Charitable Contributions

Recom Technologies encourages and supports involvement in the community that has supported it. Charitable involvement is important to the company and a charity committee meets once a month to discuss and execute potential and ongoing charitable projects. Recom Technologies may make charitable contributions to causes and organizations that are not politically affiliated. Employees should check with the Director of Operations before making any charitable contributions on behalf of Company.

K. SOCIAL MEDIA AND TECHNOLOGY

I. External Communications

Only the CEO, Marketing and Communications are authorized to represent Recom to media authorities. Legal Department represents Recom Technologies before Courts, regulatory and other public authorities, when possible, or engages external lawyers for such representation, if needed it.

II. Use of Social Media

Social media provides opportunities to network and create exposure for Recom Technologies and its branded products and services. Whereas Recom Technologies respects the right of employees to use social media for personal and professional purposes, employees are responsible for complying with its policies and procedures when communicating on social media. Employees are accountable for any information they publish online.

Employees are required to:

- Reveal their relationship with Recom Technologies when commenting online on issues related to it
- Respect the privacy of other employees and refrain from publishing photos of them without their consent
- Ensure any information they post related to Recom Technologies is accurate
- Comply with the rules of the social media sites they use

Employees should not:

- "Pretext", or pretend to be someone they are not online
- Speak on behalf of Recom if they are not expressly authorized to do so
- Share confidential information about Recom Technologies, its employees, customers, contractors, suppliers, agents, distributors, business partners and other stakeholders
- Post comments or pictures that could harm the brand, reputation or commercial interests of Recom Technologies.

III. Information Technology

Recom Technologies expects its employees to help it safeguard all computer equipment and data against intentional malicious acts by individuals inside or outside. Cyber-security training is provided to all employees to ensure compliance with computer security policies.

Recom Technologies safeguards against inappropriate access by individuals or groups untrained in correct company policies or procedures. Recom Technologies does not use software for which it does not have a license.

IV. Internet Use

Recom Technologies understands that occasional personal use of the internet during work hours is a reasonable request and allows this, within reason. Employees can ask for clarification from their respective Manager if in doubt.

However, Recom Technologies does not allow internet use to support a personal business, political venture, or embarrass it and its customers.

L. MISCELLANEOUS

I. Waivers and amendments of the Code

Recom Technologies is committed to continuously reviewing and updating its policies and procedures according to newly issued regulations and laws, social conditions, business growth and expansion. Therefore, this Code is subject to modification anytime without notification.

Any amendment or waiver of any provision of this Code must be first approved by the CEO of Recom Technologies.

II. No Rights Created

This Code is a statement of certain fundamental principles, ethics, values, policies and procedures. It is not intended to and does not create any rights in any employee, contractor, customer, client, supplier, competitor, shareholder, stakeholder, or any other person or entity.

RECOM TECHNOLOGIES CODE OF ETHICS AND BUSINESS CONDUCT

Revised in February 2024