

1. Introduction

- 1.1. **Importance of Ethics.** Conducting the business of Prytek Holdings Pte Ltd. or any of its controlled subsidiaries (collectively, the “Company”), honestly, ethically and properly is critical to the Company’s continued success and growth. The purpose of this Code of Conduct (the “Code”) is:
 - to formalize and update the Company’s existing procedures relating to business ethics in order to help the Company in maintaining its good reputation and conduct its business activities in a compliant manner;
 - to promote honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships; full, fair, accurate, timely and understandable disclosure in reports and documents; compliance with applicable laws and governmental rules and regulations; the prompt internal reporting of violations of the Code to an appropriate person or persons identified in the Code; and accountability for adherence to the Code.
- 1.2. **The Code.** In furtherance of the Company’s commitment to ethical business conduct, the Company’s Board of Directors has approved this Code, which summarizes the Company’s policy with respect to ethical business conduct. Compliance with this Code by the Company’s directors, officers, employees and consultants will help the Company to successfully perform its business activities, maintain its good reputation and assist in maintaining an effective and positive working environment.
- 1.3. **Scope.** You are subject to this Code if you are a director, officer, employee or consultant of the Company, whether directly or through a corporation (each, a “**Subject Person**”), and the Company’s directors are also expected to abide by the principles of this Code, within the scope of their duties as directors. As part of the Company’s compliance procedures with this Code, you are required to review, sign and acknowledge it by signing your name on the signature page. While this Code will be made available to you on the Company’s website: <https://prytek.com/> and periodical trainings will be performed to all Subject Persons, you are required to review this Code independently at least once every financial quarter, since this Code may be supplemented or adapted from time to time in order to reflect applicable local requirements in any jurisdiction in which the Company operates. In addition, this Code applies to your own actions as well as those you may conduct indirectly through relatives, friends or other personal relationships.
- 1.4. **Basic Standards.** This Code sets out the basic standards of ethics and conduct for the Subject Persons. These standards are designed to promote honest and ethical conduct and takes precedence in the event of a conflict with a particular local custom or practice, but will not cover all situations. If a law conflicts with our Code, you must comply with the law.
- 1.5. **Violations.** Violations of the standards set out in this Code will be subject to disciplinary action and may result termination of employment or consultancy relationships by the Company in its sole and absolute discretion, without prior notice (to the extent applicable) or any payment in lieu. Such disciplinary action shall not derogate from any right that the Company may have in connection with any such violations under any applicable law. In addition, the Company will have the right to commence legal proceedings and to sue me

any Subject Person for, among other things, any damage caused or purported to be caused to the Company and any profit that such Subject Person, or anyone else, has gained, directly or indirectly, as a result such Subject Person's violations of the standards set out in this Code.

- 1.6. **Public Disclosure of Changes and Waivers.** Any waiver or amendment of the provisions of the Code may only be granted by the Company's Board of Directors and will be promptly disclosed in compliance with applicable laws, regulations, or rules. Waivers of this Code will be granted on a case-by-case basis and only in extraordinary circumstances.
- 1.7. All Subject Persons should read this Code, understand its meaning and purpose and abide by it. If you have any doubts regarding whether a particular situation might violate our ethics standards, or if you have any other questions regarding ethics issues, you should contact in writing our Chief Compliance Officer. The matter will be reviewed and appropriate action will be taken consistent with this Code and applicable law.
2. Each Subject Person has the responsibility to act honestly and ethically in conducting activities on behalf of the Company. Your responsibility applies, among other things, to your interaction with our other directors, officers, employees and consultants. You are expected to act in good faith and with responsibility, due care, competence and diligence. You should use your independent judgment with respect to questionable behavior and at all times conduct yourself in a manner that meets with the Company's ethical standards.
3. **Compliance with Laws.** The Company is subject to a number of laws, rules and regulations with respect to the conduct of its business, which such laws, rules and regulations may vary from time to time. Subject Persons are expected to maintain compliance with the letter and spirit of all laws governing the jurisdictions in which they perform their tasks and duties. This Code does not purport to address all areas of law that Subject Persons might encounter in the day-to-day business of the Company. The following areas, however, should be specifically noted:
 - 3.1. **Health and Safety Laws:** The Company strives to comply with all applicable health and safety laws, rules and regulations as part of its commitment to providing Subject Persons with a safe and healthy work environment. The Subject Persons have a responsibility to maintain this work environment as such. In this regard, the Subject Persons are expected to work in a safe manner with due regard for their personal safety as well as that of their co-workers and to report accidents, injuries, hazardous equipment and unsafe practices. Subject Persons are prohibited from engaging in the business of the Company while under the influence of alcohol or illegal drugs.
 - 3.2. **Non-discrimination Laws:** The Company believes that discrimination in any kind of work-related matters is unacceptable. Nationality, gender, race, political or religious views, sexual orientation, or anything else unrelated to professional skills and ability to perform one's duties is of no significance. The Company is an equal opportunity employer. The Company selects candidates for a position based on their ability to solve tasks within their competence. The Company is committed to respecting and upholding human rights.
 - 3.3. **Competition Laws:** Competition laws are enacted to limit practices that are seen to impair the function of a free and open marketplace. A complete description of these laws is beyond the scope of this Code, however, they include, without limitation, price fixing, bid rigging, price discrimination, allocation of markets and boycotting of certain suppliers or customers. Subject Persons having regular dealings with customers and suppliers should become

familiar with all the laws, rules and regulations applying to these practices as non-compliance can result in severe penalties being imposed on both the Company and the individuals involved.

- 3.4. **Dealing with Sanctioned Countries:** The Company will follow all relevant laws, rules and regulations related to transaction with companies from sanctioned countries. For example, under US law, the Office of Foreign Assets Control (OFAC) administers and enforces economic and trade sanctions under various sanction programs; Israeli law makes it illegal to conduct direct or indirect trade with Iran, Syria and Lebanon; the EU's Service for Foreign Policy Instruments transposes into law sanction decisions of the EU External Action Service and agreed by the Council of the EU. The UK's HM Treasury's Office for Financial Sanctions Implementation provides a consolidated list of persons and organizations under financial sanctions, including those under the global human rights sanctions regime and other UK legislation. Violation of these sanctions by persons and entities subject to these sanctions can lead to fines and even criminal liability against the Company and individuals. Subject Persons are expected to support the efforts of the Company to follow such laws, rules and regulations and shall immediately report to the Company's management prior to dealing with any Sanctioned Country.
- 3.5. **Environmental Laws:** Recognizing its responsibility to the environment, the Company strives to comply with all applicable environmental laws, rules and regulations. Subject Persons are expected to support the efforts of the Company to develop, implement and maintain procedures and programs designed to protect and preserve the environment.
- 3.6. **Privacy Laws:** The Company is committed to maintaining the accuracy, confidentiality, security and privacy of the personal information of its customers, suppliers and employees, while personal information means any information relating to an identified or identifiable person. Subject Persons who have access to personal information are expected to support the efforts of the Company to develop, implement and maintain procedures and policies designed to manage personal information, according to privacy and data protection principles and legislation, including without limitation, Regulation (EU) 2016/679 (GDPR) together with applicable legislation implementing or supplementing the same or otherwise relating to the processing of personal data of natural persons.
- 3.7. **Insider trading laws:** While working in the Company, every Subject Person may obtain insider information about the Company and other organizations prior to this information becoming public. Use of such information for getting individual benefits for the Subject Person or third parties violates the legislation requirements. Every Subject Person is expected to comply with insider trading laws and with the following rules regarding use of insider information and market manipulation: do not make personal operations with financial instruments of organizations in regard to which you obtain insider information and do not give recommendations to others to do such operations; do not disclose insider information to anybody outside the Company, including members of your family, prior to its official disclosure; transfer insider information to other Company employees only in accordance with the regulations,
- 3.8. If you are not familiar with any details of applicable laws, rules and regulations, or if you have any questions regarding any act or procedure, you are required to seek the advice of our Chief Compliance Officer, and act in accordance with his/her guidance.

4. Anti-Bribery.

- 4.1. The Company is committed to conducting business in compliance with, among other things, anti-bribery laws, regulations and standards. The Company maintains a zero tolerance policy towards corruption.
- 4.2. The Company is active in numerous markets and must comply with the anti-bribery and anticorruption laws of many jurisdictions, which include (i) the United States Foreign Corrupt Practices Act (“**FCPA**”), (ii) applicable international conventions, including the Organization for Economic Co-operation and Development Convention on Combating Bribery of Foreign Public Officials in International Business Transactions (the “**OECD Convention**”) and the United Nations Convention Against Corruption, and (iii) other anti-bribery and corruption laws throughout the world applicable in the countries in which the Company operates.

4.3. Without derogating from the generality of the foregoing, you are strictly prohibited from:

- 4.3.1. Making facilitation payments. Such payments are considered a form of corruption and are prohibited under the local laws of most countries and by the OECD Convention and the United Nations Convention Against Corruption. We must never offer a facilitation payment.
- 4.3.2. Engaging in bribery. Subject Persons (including temporary and contract employees) are prohibited from engaging, directly or indirectly, in bribery.

For the purposes of this Code, it is clarified that bribery is defined in different ways under the laws of different countries. In general, and for the purposes of this Code, it is the offering, promising, giving or receiving, directly or indirectly, of anything of value to or from any (i) private or public organization or (ii) individual (including any government or public official). This includes the offering, promising, giving or receiving of anything of value with the intent to induce a person to perform their duties in connection with the Company’s business. Bribery takes place the moment something of value is offered.

- 4.3.3. Engaging in corrupt activities or activities that could reasonably give the appearance of corruption.

For the purposes of this Code, it is clarified that corruption is broadly defined, and includes the direct and indirect offer, promise, acceptance or solicitation in the conduct of the Company’s business of anything of value or advantage as an inducement for an action which is illegal or a breach of trust.

- 4.3.4. Allowing third parties, including service providers, agents, consultants, brokers or distributors, to engage in bribery or corruption on the Company’s behalf.
- 4.3.5. Doing business with other parties who are, or are suspected of being, engaged in bribery or corruption.

- 4.4. Political Donations. The Company’s policy is not to make political donations on its behalf, and you are prohibited from approaching any government or public officials on behalf of the Company and/or offer any political donations.

5. **Fair Dealing.** You should deal fairly with the Company's suppliers, competitors and employees as well as others with whom the Company does business. You should not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentations or any other unfair-dealing practice.
6. **Conflict of Interests.** You are required to avoid allowing your private interests to interfere, or appear to interfere, with the interests of the Company as a whole, as further detailed below.
 - 6.1. Any Subject Person is required to make or participate in business decisions and actions in the course of his, her or its employment or engagement with the Company based on the best interests of the Company as a whole, and not based on personal relationships or benefits. Although some general guidelines are provided in this Code, all Subject Persons are expected to apply sound judgment to avoid conflicts of interest that could negatively affect the Company or its business, whether or not specific rules for a particular situation are in place. In addition, Subject Persons are required to disclose to the Company any situations that may involve inappropriate or improper conflicts of interests affecting them personally or affecting other directors, officers, employees or consultants or those with whom the Company does business, as described under "Reporting".
 - 6.2. **Business Referrals.** No Subject Person may personally attempt to give or steer the Company's business transactions to companies in which a family relative or personal friend has a financial or other interest unless such transaction has been disclosed to the Company's management (CEO), our Chief Compliance Officer and legal counsels in advance and the appropriate approvals of the Company have been obtained.
 - 6.3. **Personal Investments.** Any Subject Person must avoid investments in the Company's affiliates, companies (public or private) in which the Company holds any share ownership or other companies with which the Company does business, if those investments could create a conflict of interest or the appearance of such a conflict, unless such investments have received the appropriate approvals of the Company. In addition, any personal investment in any of the above companies which represents more than 5% of your net worth is prohibited. Any proposed personal investments by any Subject Person in the Company's affiliates, companies (public or private) in which the Company holds any share ownership or in other companies with which the Company does business should be notified in advance to the Company's management (CEO), our Chief Compliance Officer and legal counsels who shall advise on the appropriate approvals, if any, required in such circumstances.
 - 6.4. **Corporate Opportunities.** Subject Persons must also refrain from purchasing property or otherwise taking for themselves personally a business opportunity that they learn about through either their employment or engagement with the Company or their use of the Company's information. Without derogating from the generality of the foregoing, no Subject Person may use any Company information or information that came to his, her or its possession in the course of being employed by or engaged with the Company in order to gain any personal benefit, directly or indirectly, including by way of investing in or engaging with the Company's affiliates, companies (public or private) in which the Company holds any share ownership or other companies with which the Company does business, without obtaining the management's prior written consent. It is also restricted to provide any such information to any third party in order for such third party to gain any personal benefit without obtaining the management's prior written consent.

- 6.5. Independent Business Ventures. Subject Persons may not engage in independent business ventures or agree to perform services for other businesses without the prior written approval of the Company, and, where such approval is obtained, may only engage in such business or agree to perform such services if the activity does not interfere with their devotion of time and effort to the conduct of the business of the Company or otherwise affect his/ her/its ability to work effectively.
- 6.6. Outside Compensation and Activities. While employed or engaged by the Company, Subject Persons must not work for (in the case of employees and officers) or seek or accept personal benefit or payment from any customer, supplier, competitor, distributor, reseller, or other business partner of the Company, except as approved in writing by an authorized officer or manager of the Company. This Section does not derogate from any non-competition obligations that you may have under any applicable employment or consultancy agreement or arrangement.
- 6.7. Outside Board Service. Employees and officers of the Company are required to obtain prior written authorization from the Company for service as a director, general partner, manager, officer or similar position with any privately-held or public business entity or as an appointee to any kind of governmental or quasigovernmental agency or body.
- 6.8. Gifts and Gratuities. Subject Persons must not seek or accept gifts or gratuities in the form of services or other items of value from the Company's customers, other business partners or other parties with whom the Company contracts except for a gift that meets all of the following criteria: 1) its value is equal to or less than \$ 100; 2) its acceptance does not create a conflict of interest; 3) its acceptance is disclosed to the Company and approved by the Chief Compliance Officer or other appropriate officer or manager of the Company. Subject Persons should never accept anything that would appear to create a conflict of interest. In the unusual situation where refusal to accept a true gift might hurt the Company's business, be sure to consult the appropriate officer or manager of the Company concerning the proper means of resolving the situation.
- 6.9. Business Entertainment. Subject Persons must adhere to the Company's policies as issued from time to time with respect to costs of business entertainment. Extending or accepting invitations to reasonable meals, public events and similar business activities incurred for bona fide business purposes is generally acceptable, assuming the costs are not disproportionate to the business purpose and otherwise do not create the fact or appearance of a conflict of interest. Attending entertainment events which may appear contrary to professional standards of conduct must be avoided.
- 6.10. Travel and Out of Pocket Expenses. Subject Persons are expected to comply with the Company's travel and out of pocket expenses policies in effect from time to time. The Company expects that all travel-related and other expenses be used, accurately reported and recorded in compliance with these policies. If these expenses are to be paid by a customer or other business partner of the Company, or if you wish to pay the expenses of your customer or other business contact, traveling to the Company's location, your manager or a Company officer must approve these in advance.
- 6.11. Indirect Violations. You should not indirectly (such as through a spouse, family member, affiliate, friend, partner, associate or an entity with which you have an active or significant business or financial relationship) have any interest or engage in any activity that would violate this Code if you directly had the interest or engaged in the activity. Any such

relationship should be fully disclosed to the Company's management and the Chief Compliance Officer (and in the case of a director to the Board of Directors), in order to determine whether the relationship is inappropriate based upon the standards of this Code.

7. **No Side Agreements.** Subject Persons may not enter into side letters with customers or prospective customers regarding the sale of the Company's products or services or into any similar arrangement, whether written or not, that results in the actual terms of a sale or service being different from those included in the relevant agreement with a customer received from a customer. Side agreements may include verbal obligations as well as obligations set out in email communication to third parties.
8. **Protection and Proper Use of Company Assets.** You should protect and properly use the Company's assets and property. All company assets should be used only for legitimate business purposes. Use of the Company's computer networks and other communication channels for inappropriate purposes is prohibited. Use of computer networks and communication channels for personal reasons should be reasonable, kept to a minimum and not interfere with business activities.
9. **Integrity and Recordkeeping.** Keeping accurate records of the operations is the fundamental principle of the Company's financial responsibility. The Company ensures that all required records are captured and correctly filed in order to provide timely, accurate and complete financial information.
10. **Confidentiality.** The obligation of Subject Persons to protect Company assets includes the Company's proprietary information, including intellectual property such as trade secrets, patents, trademarks and copyrights, as well as business, marketing, financial, human resources, technical and administrative information that has not been properly released to the public domain. Unauthorized use or distribution of this information violates the Company's policy. It could also be illegal and result in civil or even criminal penalties. Except when disclosure is specifically authorized, you must maintain the confidentiality of all nonpublic information that you obtain in the course of your work activities. This Section does not derogate from any confidentiality obligations to which you may be subject.
11. **Reporting.**
 - 11.1. If you have questions about this Code or concerns about any of the matters listed herein, please first consider speaking with your immediate manager or supervisor if that person was not involved in the matter giving rise to your questions. If you do not wish to communicate with that person on the matter, please feel free to contact any member of the Company's management or our Chief Compliance Officer.
 - 11.2. The Company encourages each of the Subject Persons to report any concerns that others in the company may have engaged in illegal or unethical conduct relating to the Company's business. The Company does not discriminate against any persons who report their good faith concerns to it.
 - 11.3. It is a violation of the Company's standards for any Subject Person to communicate a report claiming illegal or unethical conduct which the Subject Person knows to be false.
 - 11.4. If you wish to report or discuss any problem concerning this Code, please promptly inform your supervising manager or our Chief Compliance Officer. If you wish to communicate any matter anonymously, you are free to do so, and we will maintain the confidentiality of your

matter anonymously, you are free to do so, and we will maintain the confidentiality of your communication to the extent possible under applicable laws. Communications intended to be confidential should be mailed in writing without indicating your name or address to the Company's address.

12. Administration of the Code

- 12.1. The Code is designed to ensure consistency in how the Subject Persons conduct themselves. No set of rules can cover all circumstances. Nothing in this Code should lead to the contravention of local laws, which, wherever contrary, will prevail.
- 12.2. The Company is committed to implement and maintain the following compliance elements in order to achieve the goals set out in the Code:
- 12.2.1. Management Commitment. The Company's management is committed to give significance and legitimacy to the Code by publicly supporting the Code, compliance policies and procedures, providing sufficient resources and supporting training sessions.
 - 12.2.2. Policies and procedures. The Company establishes procedures, processes, approval process flows, and decision tables, screenings to incorporate the culture of compliance into its day-to-day operation and help guide the Subject Persons to make consistent and correct transaction decisions.
 - 12.2.3. Risk assessment and due diligence. The Company identifies, assesses, and defines its risk profile, and devotes appropriate scrutiny and resources to the spectrum of risks. The Company applies a risk-based due diligence to its third-party relationships.
 - 12.2.4. Training and communication. Ethical culture. The Company undertakes to hold regular training sessions in order to help the Subject Persons understand their compliance role and how they need to contribute and to let the Subject Persons know the Company's position concerning misconduct. The Company ensures an atmosphere of open communication between the staff where every Subject Person feels comfortable to bring up any ethical issue for discussion.
 - 12.2.5. Monitoring and auditing. The Company is engaged to schedule monitoring and internal audits to be conducted at least on an annual basis that involve a comprehensive assessment of the procedures as well as reviewing selected transactions and how each business unit handled these in relation to the current procedures in order to evaluate the effectiveness of the Company's compliance procedures.
 - 12.2.6. Continual improvements. The Company periodically reviews the Code and its policies and procedures to ensure that they are not stale and revises them in light of lessons learned.
 - 12.2.7 Reporting. The Company's policy is: "If you see something wrong, say something". The Company encourages the Subject Persons, contractors and other third parties to report any suspected or actual violations of laws, government rules and regulations, the Company's Code and other policies and procedures by the Subject Persons. Any form of retaliation against those who, in good faith, seek help, provide information,

or otherwise assist in an investigation regarding any known or suspected violations, is strictly prohibited by the Company.

12.2.8 Handling violations and taking corrective actions. The Company investigates, as appropriate, all allegations of potential violations of the Code and ensures that the investigations are properly scoped, and are independent, objective, appropriately conducted, and properly documented. Reports of such allegations and investigations, including the final outcome of investigations, are provided periodically to the Company`s management and to the Board of Directors.

12.2.9. Enforcement. The Company establishes incentives for compliance and disincentives for non-compliance. The Company ensures that clear disciplinary procedures are in place and they are commensurate with the violations.

12.3. This Code is for the benefit of the Company, and no other person or entity is entitled to enforce this Code. This Code does not, and should not be interpreted to, create any private cause of action or remedy in any other person or entity for a violation of the Code. In addition, this Code should not be construed as a contract of employment and does not change any person's employment status.

Last update: October 29, 2020

Acknowledgment of Receipt

I have received and read the Prytek Code of Conduct (the “Code”). I understand that the standards and policies contained in the Code. I agree to comply with this Code at all times during my employment or engagement with the Company. I understand that my failure to comply with these requirements may result in disciplinary action against me, including termination of my employment or consultancy relationships with the Company, without prior notice (to the extent applicable) or any payment in lieu, in the Company’s sole and absolute discretion, and that such disciplinary action shall not derogate from any right that the Company may have in connection with such violations under any applicable law. I further understand that the Company will have the right to commence legal proceedings and to sue me for, among other things, any damage caused or purported to be caused to the Company and any profit I have, or anyone else has, gained, directly or indirectly, as a result my failure to comply with these requirements.

I further understand that this Code may be amended or modified from time to time by the Company.

Name

Signature

Date