



Code of Ethics

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The Code

29Bison, LLC operates under a wide variety of laws and regulations. At times, we tailor our decisions and actions to specific facts and situations. But wherever we operate, our values and principles will not change. This Code underscores those values and principles while also providing a practical resource to check policies, guide decisions and help employees and others understand when and how to find guidance.

By living our values and following the Code, we each can help spark innovation, build partnerships and drive performance. Our values and this Code help guide how we engage with our customers, our business partners, our colleagues and the communities where we work and live.

The Code applies to all employees, officers, and advisors of 29Bison and to consultants, contractors, temporary employees, and agents performing services for us or on our behalf (such as our business partners). In other words, it applies to all members of our herd. Any third parties acting for or on behalf of 29Bison should be made aware of their obligation to comply with the Code.

If there is ever a conflict between this Code and local laws and/or supplemental policies that apply to our job, we must comply with the most restrictive requirement. Each section of the Code contains a statement of principle and an explanation of why it matters, along with specific actions to take and resources for assistance. If any of us have questions about how the Code might apply, we should Seek Help.

Waivers

In the unusual circumstance that you believe you may need a waiver of particular provisions of the Code, you should contact a 29Bison Partner. Any waiver may be granted only by a Partner of 29Bison.

Our values

As members of this vibrant, cohesive community, under Cupernicus' watchful eyes:

- We are solutions architects; we employ practical, impactful approaches to create value
- We focus on the long-game; respected for charting our clients' best path forward
- We are unbiased listeners who treasure the wisdom of the herd
- We are bold truth tellers who act with courage, candor and caring
- We are nimble, adaptable, and willing to meet clients where they are
- We are insatiably curious; persistent, determined, perpetual learners
- We are ethical stewards and trusted guides; recognized for going above and beyond

We strive for alignment with the following UN Sustainable Development Goals:

- Goal 5: Gender Equality
- Goal 8: Decent Work and Economic Growth
- Goal 12: Responsible Consumption and Production
- Goal: 15 Life on Land
- Goal 16: Peace, Justice, and Strong Institutions

Our responsibilities

Accountability for Everyone; Responsibilities of leaders and managers

All 29Bison employees have an obligation to hold themselves and each other to the policies and high ethical standards described in this Code. This means we each are expected to read and understand the Code and any supplemental materials that might apply to us and act accordingly. If you are unsure about any part of the Code or if you do not know what supplemental materials apply to you or how to access them, you must ask for guidance and clarification. In addition to upholding our values, we are all expected to:

- Learn about, understand, and comply with the laws, rules, regulations, and policies that apply to our specific positions
- Ask for guidance if we have questions about the applicability or interpretation of any law, rule, regulation or policy
- Speak up if we see or suspect unethical behavior or a violation – whether of laws, policies or this Code
- Complete mandatory compliance training
- Respect local customs of countries where we do business, provided doing so does not violate laws or this Code
- Acknowledge that we have received and read this Code and understand our obligations to comply with it

Disciplinary action, up to and including termination and/or legal proceedings, may result from any failure to comply with laws, rules or regulations that apply to each of us, our Code, or any other 29Bison policy or requirement.

Leaders – including partners and managers – at 29Bison are expected to hold themselves to the same high standards that they demand of their teams. Leaders play an essential role in building a culture of transparency, open communication and trust that extends from colleagues to customers to business partners. To help achieve this, leaders should:

- Live our values every day
- Listen and take action when team members raise concerns – whether big or small
- Be knowledgeable about the laws, rules, regulations, and policies that apply to their teams
- Personally handle or escalate compliance issues appropriately

- Highlight and recognize decisions that honor our values and long-term success over short-term gain
- Demonstrate accountability and a willingness to listen to all points of view
- Make time to discuss the importance of ethics and compliance regularly with their teams
- Encourage colleagues and others to contact their supervisor, manager or a Partner when issues or questions arise and to be timely and candid in reporting any unethical or illegal conduct or compliance issues

Making ethical decisions

Even those of us who are very familiar with our values, this Code and our policies may find ourselves in situations where we are unsure of what course to take. In such cases, we can ask for guidance and direction. Before moving forward, ask for help from your supervisor, manager, a Partner or 29Bison's outside counsel.

We all have an obligation to speak up to report unethical or illegal conduct or if we reasonably believe that a violation of this Code has occurred. Our willingness to ask for guidance and to accurately and truthfully describe the situation in a timely manner is of the utmost importance. 29Bison values candor and transparency.

You are encouraged to ask questions and seek guidance whenever you have a concern. Speak up even if you are not sure something problematic has occurred. You have several options for doing so. Your immediate resources are your manager and the 29Bison Partners.

There may be cases where the Code specifies approval is needed before taking a certain action. In such cases, if the approver is not specified, you should speak with a Partner.

Anonymity and confidentiality

Identifying yourself when making a report usually allows for a more thorough and effective investigation. However, there may be times when you are not comfortable contacting your manager directly about an issue (for example, if the issue concerns your manager). If you wish to make a report or obtain information or advice anonymously, you can contact a Partner or 29Bison's designated outside counsel. Confidentiality will be maintained to the fullest extent possible, and information will be shared only on a need-to-know basis.

Retaliation is prohibited

29Bison prohibits retaliation against anyone who makes an inquiry or reports an allegation in good faith or who truthfully participates in an investigation. "Good faith" does not mean you have to be right or have incontrovertible proof – it just means you must have a reasonable belief in the truth and accuracy of what you are reporting.

If you believe someone is retaliating or plans to retaliate against you or someone else, reach out.

Investigations

Investigations will be conducted promptly and thoroughly, and confidentiality will be maintained. Information regarding complaints and reports will be kept by the Partners and outside counsel, as

appropriate. Partners will maintain records of any such reports or complaints, tracking their receipt, investigation, and resolution.

Fair process and disciplinary action

All reasonable efforts will be made to determine the relevant facts behind any reported violation and bring the investigation to a timely conclusion. Any employee who becomes involved in an investigation is obligated to cooperate.

Failing to cooperate with an investigation may result in disciplinary action, up to and including termination and/or legal proceedings. Failure to cooperate includes:

- Knowingly providing false or misleading information
- Refusing to be available for a meeting or discussion during an investigation
- Knowingly withholding, destroying, or deleting pertinent information

Providing equal opportunities

We promote equal employment and provide reasonable accommodations for qualified individuals wherever we do business and provide equal employment opportunities with regard to hiring, compensation, promotion, classification, training, apprenticeship, referral for employment and other terms of employment without regard to the classifications listed in the anti-discrimination section of the Code.

We are committed to complying with applicable laws, rules and regulations governing nondiscrimination. We also provide reasonable accommodation for qualified individuals with disabilities and for colleagues with sincerely held religious beliefs. For these purposes, a “reasonable accommodation” is a modification or adjustment to job duties or the work environment that enables an employee to perform the essential functions of the job while not putting undue hardship on 29Bison. Contact your manager or a Partner if you believe you require accommodation to perform the essential functions of your position, need a religious accommodation or have questions.

Fostering a respectful workplace

We actively foster a work environment where all members of the herd are treated with dignity and respect.

Why it matters

When discrimination, harassment, and bullying take root in the workplace, they inhibit communication and damage productivity. They run counter to everyone of our values: trust, innovation, partnership, and performance. We cannot properly share ideas and concerns or work together as a team if any member of our team or partnership feels targeted or unsafe. Additionally, these types of acts may leave us vulnerable (as individuals and as a company) to fines, lawsuits, and civil or even criminal proceedings.

By putting a premium on fairness, equality, respect, and dignity and not allowing discrimination, harassment and bullying, everyone who enters our workplaces should feel protected and empowered to achieve their full potential.

How we deliver

Anti-discrimination

We do not tolerate discrimination. This means we do not allow unequal treatment on the basis of:

- Race, color, or ethnicity
- Religion
- Sex or gender
- Pregnancy
- Gender identity or expression
- Sexual orientation
- Age
- Marital status
- National origin
- Citizenship status
- Disability
- Veteran status
- Any other classification protected by applicable laws or regulations

Embracing diversity and inclusion

We foster an inclusive workplace and a diverse workforce that reflects the wide variety of customer and communities we serve.

Why it matters

We work best in partnership. When our team has an extensive range of skills, expertise and experiences, it enhances our abilities as colleagues to partner with each other and with our clients. The more perspectives we can provide, the more potential there is for innovation and value creation. The more that all employees feel valued and free to reach their full potential, the more trust can develop among all of us.

A commitment to diversity and inclusion honors our values, aligns with our purpose, and ensures that we are credible advisors to our clients.

How we deliver

Diversity

We foster an inclusive workplace where all bison are valued and have the opportunity to reach their full potential.

We embrace diversity of all kinds – including in thought, experience, and style. We know this drives innovation, creativity, fuller perspectives and delivers important competitive advantages

Keeping workplaces safe, secure, and healthy

We ensure a work environment where health, safety and security are paramount.

Why it matters

A safe and healthy workplace not only protects us from harm but also builds trust, prevents costly accidents and enhances the company's reputation as a responsible corporate citizen

How we deliver

Health and safety

To prevent dangerous conditions in our workplaces and protect our colleagues, business partners, clients, and visitors, we:

- Comply with both the letter and the spirit of all applicable occupational and environmental health and safety laws
- Understand and follow all safety policies and procedures
- Take any mandatory or on-the-job training that improves our ability to safely perform job responsibilities and use company equipment
- Require that all contractors, vendors, and colleagues abide by safety regulations
- Identify potential safety violations and take action to remedy these situations
- Maintain accurate and up-to-date safety records

Security

We do our part to ensure the security of our workplaces by:

- Following all required security procedures and access controls in our facilities
- Speaking up when we see something that seems suspicious or threatening
- Participating in safety-related drills and preparations

Threats, workplace violence and weapons

We do not tolerate acts or threats of violence, intimidation, or hostility in our workplace, whether directed at colleagues, business partners, clients, or visitors. We also do not allow:

Weapons or hazardous devices at any facilities leased or owned by 29Bison, at 29Bison-sponsored functions, or on company business unless legally allowed and cleared with prior written approval from a Partner.

- Behavior that injures or is likely to injure another person
- The making or sending of harassing or threatening statements (regardless of how these messages are delivered)
- Behavior that damages or is likely to damage property
- Stalking or surveillance of another person
- Committing or threatening to commit violent acts

This policy may extend to activities outside of work if they adversely affect the company's reputation or interests or the safety of our team members. If you feel someone is being threatened or subjected to violence, are concerned that someone may cause harm to him or herself, or see something suspicious, move out of harm's way, call the local police, follow the instructions of emergency authorities, and contact a Partner. If there is a life-threatening emergency, call 911, the local police or emergency responders.

Drugs and alcohol

Drugs and alcohol can be a danger to everyone in the workplace. 29Bison does not allow the possession, use, purchase, attempted sale, distribution, or manufacturing of illegal drugs in its

workplaces. We also do not allow the abuse or misuse of alcohol and prescriptions drugs either in the workplace or when conducting company business. This means we:

- Do not report for work while impaired by drugs or alcohol
- Do not possess or consume alcohol on 29Bison premises without specific prior authorization from 29Bison
- Use good judgment when consuming alcohol at an event sponsored by 29Bison, a customer or an organization that we are supporting

Employees in violation of this policy will be subject to disciplinary action, up to and including termination. Violations could also lead to arrest and prosecution by law enforcement if such violation involve illicit drugs or other illegal activities. Where permissible by law, 29Bison reserves the right to investigate compliance with this policy, including drug and/or alcohol testing by a qualified medical professional and searches in the workplace.

If you believe someone in the workplace may have an issue with substance abuse or be impaired, contact your manager or a Partner.

Harassment and bullying

We also do not tolerate harassment of any kind at our workplaces, including sexual harassment and bullying. We support dignity in the workplace without regard for whether the person engaging in the conduct, or the recipient is a team member, manager, business partner, client, consultant, or visitor. This means we do not allow conduct that:

- Has the purpose or effect of creating an intimidating, hostile or offensive work environment or otherwise adversely affects an individual's employment opportunities
- Explicitly or implicitly links submission to sexual conduct as a term or condition of employment or promotion decisions

29Bison will not tolerate discrimination, harassment or bullying in the workplace. Even if local law does not explicitly prohibit these acts, we hold members of our herd to a higher standard.

Speaking up for safe workplaces

If you witness inappropriate conduct in the workplace, speak up and do not look the other way, regardless of whether the individual who engaged in the behavior is a manager, business partner, client, consultant, or visitor. If you are comfortable addressing the behavior directly with the individual who engaged in it, you may. However, you are not required to do so. In any event, you should contact your manager or a Partner if you believe a specific situation may require their involvement.

29Bison will take prompt and appropriate action if it determines that a violation of this policy occurs, which may result in disciplinary action, up to and including termination of employment.

Our marketplace

We act in the best interest of 29Bison and avoid situations that even appear to compromise our judgment.

Recognizing and avoiding conflicts of interest

Why it matters

Our clients and partners rely on 29Bison to provide trusted answers. A conflict of interest may arise whenever our personal interests as individuals interfere, or appear to interfere, with the interests of the company. Conflicts of interest also can arise if we take actions or have interests that may make it difficult for us to do our jobs objectively and effectively. This can call into question our judgment and our products and services. If broken, the bonds of trust that we have developed over time with customers and partners can be difficult to rebuild. By knowing how to recognize and disclose or avoid potential conflicts, we protect our reputation and our ability to do business effectively.

How we deliver

We avoid real or perceived conflicts of interest at all times. This means we:

- Take responsibility for identifying situations that could compromise or appear to compromise our judgment
- Seek help if we suspect a potential conflict
- Disclose any potential conflicts in writing to the appropriate manager or to a Partner to resolve the conflict and/or pre-clear it in writing with 29Bison's outside counsel and act consistently with whatever decision is made
- Put the company's interest in any business transaction ahead of any personal interest or gain

Keep in mind that not all conflicts are prohibited. Some conflicts of interest are permissible if they are disclosed and approved. Below are some common areas where conflicts arise.

Relatives and friends

A conflict can arise if you or someone with whom you have a close relationship receives improper personal benefits (such as cash, gifts, entertainment, services, discounts, loan or guarantees) or is selected by 29Bison as a supplier, consultant, or business partner because of your position at 29Bison. This means we avoid:

- Directly or indirectly supervising colleagues with whom we have a close relationship
- Taking part in hiring or promoting those with whom we have a close relationship or influencing their compensation, benefits, or opportunities if they work at the company
- Participating in transactions between 29Bison and businesses that are owned by or that employ someone with whom we have a close relationship. It may be a conflict of interest if you or someone with whom you have a close relationship owns more than 1% of a client, supplier, or competitor

We each must avoid putting ourselves in positions where the interests of those with whom we have a close relationship could improperly influence our decisions.

Corporate opportunities

We may not take for ourselves any opportunity that was created or discovered through the use of company property, information, or other resources, or through our position at the company. This means we:

- Use company property, company information and our position only to advance the company's interests and not for personal gain
- Recognize when a product, service, invention, or business connection might be of interest to 29Bison and communicate it to the company

Outside employment

We take on outside employment only if it does not interfere with our judgment or ability to perform our job duties at 29Bison to the best of our ability. This means that while working for 29Bison, we each:

- Ensure our employment or engagement with another company does not affect our work at 29Bison
- Obtain prior approval before taking on the role of director or officer for another company (other than private family companies that have no relation to 29Bison or our businesses);
- Do not accept work if it would cause us to improperly disclose the company's confidential or proprietary information
- Do not compete with 29Bison or work for our competitors
- Do not use company resources or time to perform work for second jobs, personal businesses, board memberships or civic positions

Organizational conflicts of interest

When dealing with the government, we avoid situations that might give 29Bison an unfair competitive advantage or that could affect our ability to perform work objectively as individuals. This means we:

- Work in good faith to address and resolve any claims of organizational conflicts of interest
- Remember that many conflicts or potential conflicts can be resolved if they are properly disclosed in a timely manner
- Ask for guidance if you are ever unsure about a potential conflict

Dealing fairly and honestly

We compete vigorously, fairly, and openly.

Why it matters

Anti-competitive practices harm customers and distort markets. These practices severely damage partner relationships by eroding their foundational trust. Competition and antitrust laws prohibit making agreements with competitors, customers, suppliers or other third parties that limit competition. Even though competition laws are complex and dynamic, we are expected to know the law in this area. If we fail to act lawfully, we can hurt the company's reputation and leave 29Bison and ourselves open to the potential of substantial fines and even criminal prosecution.

How we deliver

Fair dealing

We treat our competitors, customers, suppliers and security holders with fairness and respect. This means we:

- Comply with the letter and spirit of applicable laws
- Recommend only products, services, and solutions that we believe are the proper fit for each customer's needs
- Remain transparent and forthright in all contracting
- Award contracts based on merit and clearly defined benchmarks
- Provide accurate and timely documentation
- Deliver on what we promise
- Are honest and accurate in advertising and marketing claims, avoiding exaggeration, misrepresentation, and ambiguity
- Take particular care when making comparative claims and do not disparage or unfairly criticize a competitor's products or services
- Do not gather competitive intelligence in unlawful or unethical ways

Competition and antitrust

We abide by all competition and antitrust laws that apply to us, avoiding situations that could put us at risk of even appearing to violate these laws. This means we do not engage in discussions with competitors to:

- Fix prices
- Divide sales opportunities or territories
- Agree not to solicit each other's customers;

- Boycott or refuse to sell a particular product to a certain customer, supplier, or vendor
- Rig bids
- Share confidential information about pricing, profits, costs, sale terms, credit terms, customers, discounts, promotions, marketing or strategic plans, mergers and acquisitions, or any other sensitive information
- Because competition and antitrust laws are so complex and there may be exceptions or variations from location to location, you should consult a Partner or with questions or concerns

Working in a global community

We act as responsible citizens in the global marketplace, relying on our performance and innovation, not on bribes or other corrupt practices, to earn business.

Why it matters

Bribes, corruption, and illegal payments all have a deeply damaging impact on our society. They can harm economies, destabilize governments, and undermine public trust. These types of actions can result in both personal and company fines and even imprisonment. We have an obligation to fight bribery and corruption, should we encounter it. Doing so allows us to protect the communities where we work and helps to level the business playing field. We believe we should win on the merits of our performance as individuals and as a company.

How we deliver

Anti-bribery and anti-corruption

We do not tolerate bribery or corruption in any form. This policy applies to all the business segments we work in. We take responsible steps to ensure business partners we hire do not engage in illegal or unethical actions when acting on our behalf. We expect all 29Bison business partners to meet these standards, understanding that we can be held liable for their actions, which – good or bad- reflect on the company. This means we:

- Do not offer or accept bribes or kickbacks
- Do not make facilitation or “grease” payments, even if they are legal in the country where requested
- Report to our supervisor, manager, a Partner, or our outside counsel if we are offered a bribe, asked for a bribe or asked to make a facilitation payment
- Offer or accept only reasonable hospitality or business expenses
- Record all payments and receipts honestly and accurately
- Carry out a level of due diligence appropriate to the risk before we engage business partners
- Communicate our Anti-Bribery & Anti-Corruption Policy to business partners at the outset of our business relationships and as appropriate thereafter
- Watch out for red flags, including vague descriptions of payments or services, payment requests in exchange for approvals, or signs of over invoicing or false invoicing
- Mitigate or terminate business relationships as appropriate if we learn that a business partner may have violated our standards

If you have any questions about bribery or corruption please ask for guidance from your supervisor, manager, a Partner or 29Bison’s outside legal counsel.

Gifts and entertainment

We use our best judgment in the giving and receiving of gifts to avoid even the appearance of improper influence. This means we:

- Ensure all gifts, meals, services, and entertainment we give or receive are infrequent and not excessive in value
- Comply with applicable laws and regulations wherever we do business
- Refuse to give or accept cash gifts

- Do not give or accept anything of value if it would appear to improperly obligate someone to act in a certain way or if it would embarrass either party if made public
- Know that when a government official is involved, we may not offer or accept gifts, meals, services, or entertainment without prior approval from 29Bison's outside counsel
- Know the relevant gift policies that govern our actions in various business locations, recognizing that in some countries, it would be offensive to return or refuse a gift and that in such situations we may accept the gift on behalf of 29Bison and consult a Partner about how the gift should be treated

If you have any questions about whether any gift, meal, service, or entertainment would be acceptable under the Code, please ask for guidance from your supervisor, manager, a Partner or 29Bison's outside counsel.

Anti-money laundering

Money laundering is a process by which funds generated through criminal activity (such as terrorism, drug dealing or fraud) are processed through commercial transactions to hide the source of the proceeds, avoid reporting requirements, or evade taxes. We follow all anti-money-laundering and anti-terrorist financing laws that are applicable to us and do not condone or facilitate money laundering. This means we:

- Emphasize the importance of knowing and understanding whom we deal with ("know your customer"), remain alert for instances of money laundering and immediately notify a Partner and/or 29Bison's outside counsel of any suspicious activity (without informing the third party in question). Suspicious activity by clients may include:
 - Reluctance to provide basic information or documentation or providing false or misleading information or documentation.
 - Using shell companies (companies without a business purpose) or complex or unusual structures, particularly within multiple high-risk jurisdictions
 - Requesting 29Bison to provide them secrecy.
 -

Delivering value for our clients

We are proud of the work that we perform and take pride in delivering excellent value on every client assignment. Each member of the herd is responsible for gathering feedback from clients about their satisfaction with our work and identifying ways we can make that work even better.

Why it matters

After our people, 29Bison's reputation is our most important asset. And our reputation has been built by delivering high quality work for each client we have served and each assignment we have completed. Our herd collaborates so that we are constantly evolving and increasing the value we create for clients.

How we deliver

Seek independent feedback from clients

After we have completed several projects with a client, 29Bison will use the services of an independent firm to collect feedback from the client about their satisfaction with the work we have delivered. Once this information is summarized, it is shared with all members of the herd. Each of us are responsible for understanding the client's input, celebrating the things that went well, and examining how we can act upon any constructive criticism shared by a client.

Request direct feedback from clients

We also strive to foster relationships with clients that encourages them to share feedback directly with each of us.

- recognizing that in some countries, it would be offensive to return or refuse a gift and that in such situations we may accept the gift on behalf of 29Bison and consult a Partner about how the gift should be treated

If you have any questions about whether any gift, meal, service, or entertainment would be acceptable under the Code, please ask for guidance from your supervisor, manager, a Partner or 29Bison's outside counsel.

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 - Requesting 29Bison to provide them secrecy

Our assets and information

Our assets and information

Respecting our intellectual property and that of others

We protect all intellectual property against misuse, whether it belongs to 29Bison or to someone else.

Why it matters

Intellectual property is the lifeblood of our business. From the systems and databases, we create, to the services and solutions we provide to our clients, to the processes we use in our business, intellectual property is vital to 29Bison. Knowing how important it is to us and to others, we have an important obligation to protect and defend all intellectual property against improper use. By doing so, we put our company, and all our stakeholders, in the best possible position to recognize and generate additional value for their business.

How we deliver

We recognize when intellectual property should belong to 29Bison and take all necessary action to protect it. This means we:

- Agree, to the extent permitted by law, that 29Bison owns all intellectual property (and related rights) that we create during our employment, whether we created them in the office, at home or elsewhere, if they are related to company business or created with company resources
- Waive or assign to 29Bison all moral rights we may have under applicable law to intellectual property that we create as employees
- Promptly disclose any methods, systems, processes, designs, ideas, or other patentable works we create as employees so the company can take steps to protect them
- Report any unauthorized use of company copyrights, patents, trademarks, or other intellectual property of which we become aware to a Partner or 29Bison's outside counsel
- Put copyright notices on all 29Bison materials, information, services, or other products intended for public distribution

Intellectual property of others

We respect the intellectual property of third parties including competitors, and do not use it in a way that would violate the law or our values. This means we:

- When necessary, request written permission to use or copy a third party's copyrights, patents, trademarks, or other intellectual property, obtain licenses, or if the circumstances require it, purchase the intellectual property outright
- Ensure licensing agreements permit copying or distribution where necessary and do not impair the company's rights before we copy or distribute third party software
- Ensure intellectual property belongs to 29Bison when it is created for us by third parties or contractors, where allowable by law
- Check with outside counsel if we are in doubt about any intellectual property question

Competitive intelligence

Understanding our competitors is essential to growth and competitive advantage. We obtain intelligence about our competitors only through lawful and ethical channels. In addition to following our rules on respecting the intellectual property rights of others, this means we:

- Understand and follow all applicable laws and regulations before engaging in competitive intelligence gathering
- Do not distribute data or other sensitive information about a competitor if it was received or accessed in circumstances that may breach any of our competitive intelligence guidelines
- Never misrepresent our personal or company identity to gain access to a competitor's product or service
- Do not breach contract terms, or encourage third parties to do so, to help 29Bison obtain a competitive advantage

Before seeking out or using competitive intelligence, make sure you understand these guidelines. Ask for guidance from a Partner and 29Bison's outside counsel if you have any questions.

Protecting confidential information and data privacy

We safeguard and protect the confidentiality and privacy of information that we hold and prevent it from being improperly accessed, shared, or lost.

Why it matters

Our competitive edge depends on the security, privacy, and integrity of the information we hold – whether that information belongs to us or to others. How we handle confidential and personal information sets us apart from our competition, and if we get it wrong, our customers, colleagues, and company all could suffer. Improper handling could disadvantage us in the marketplace, harm consumers, leave us vulnerable to civil and criminal penalties, impede our innovation, hinder our performance, and damage our business relationships.

How we deliver

Confidential information

As part of our job or position, we may learn or have access to nonpublic or inside information relating to 29Bison business, operations, or customers. If this information is not in the public domain, we should treat it as confidential. We should not share confidential information with anyone, including individuals within 29Bison unless there is a legitimate need to know, and we are authorized to do so. Confidential information includes some of our most valuable assets, such as the following:

- Trade secrets
- Pricing policies and information
- Business or strategic operating plans and outlooks including investments, merger, acquisition, and divestiture plans
- Nonpublic financial information about 29Bison or our employees, customers, and business partners

- Nonpublic and sensitive information about our clients, their employees, customers, and business partners
- New product, brand or marketing studies, developments, plans or forecasts
- Customer data, including contact details, specifications, preferences, and subscription lists
- Contracts and agreements, including items such as expiration dates, any exclusivity provisions, and financial conditions
- Legal information, including data or information covered by legal privilege
- Data that 29Bison has a legal or contractual obligation to protect (e.g. credit card data, healthcare records or personally identifiable information)
- Information about our IT systems and infrastructure

Data protection and privacy

Many countries have data protection and privacy laws and regulations that govern the collection, use, retention, and transfer of certain information about individuals. This is a rapidly changing area of law, and each of us should consult the resources referenced in the Code or contact a Partner or 29Bison outside counsel regarding appropriate collection, use, retention, or transfer of information about individuals, including our customers, business partners, marketing contacts, employees, contractors, consultants, and other individuals.

Using and protecting our confidential information and other data

We have established information security and privacy policies and practices to protect data, whether it belongs to us, our customers, or our business partners. This means we:

- Read, understand, and follow our information security policies and procedures when it comes to handling data
- Understand how data is classified at 29Bison and therefore how it should be handled
- Store information using only company-approved storage devices
- Collect, use, retain and transfer data and information about individuals in accordance with applicable data protection and privacy laws and regulations
- Obtain proper authorization before sharing any confidential or personal information, which might include obtaining written authorization and signing a nondisclosure agreement
- Respond quickly to requests for information about our data-handling practices by following company processes to ensure we do so safely and properly
- Ensure that we are familiar with and comply with the company's privacy policies
- Protect 29Bison confidential information even after we leave the company

Insider trading

Some of us have access to material nonpublic information about 29Bison, our clients, customers, suppliers, and business partners with which 29Bison either does business or is negotiating significant transactions or agreements. Misuse of material nonpublic information could result in violations of insider trading laws and carry severe penalties. We are careful to treat this "insider information" lawfully and ethically. This means we:

- Do not trade in or encourage another person to trade in the securities of public companies while in possession of material nonpublic information

- Do not engage in “tipping” – the disclosure of material nonpublic information about 29Bison or other public companies to other people, such as relatives or friends, who may trade based on the information or disclose it to others.

If you are not sure whether certain information is considered material or nonpublic, consult a Partner of 29Bison outside counsel before engaging in any securities transactions.

Using information and communications systems responsibly

We respect company communications systems and use them appropriately so that they operate as efficiently and effectively as possible.

Why it matters

Nearly all the work 29Bison does each day runs in some way through our information and communications systems. When we each take personal responsibility for using these systems properly, it protects the integrity of the data we store and transmit, and it ensures that we all have prompt access to the systems we need to help our organization thrive. Likewise, improper use leaves us all vulnerable to hackers, data breaches, shutdowns, and miscommunications, as well as legal repercussions.

We use company information and communications systems properly. This means we:

- Limit personal use of e-mail, the internet, and phones
- Do not access, download, or send material that is offensive, harassing, explicit or otherwise inappropriate for work unless we are authorized to do so as a part of our jobs (e.g. project managers communicating due diligence, investigation, or audit findings)
- Avoid careless, exaggerated, or inaccurate statements that could be easily misunderstood or used against 29Bison or a client in legal proceedings
- Think before we hit Send
- Do not use personal software on work devices or download or redistribute copyrighted material, such as music and software, unless legally permitted
- Never use unauthorized peer-to-peer software to share copyrighted material
- Never share use IDs, passwords, access details, software, services, or authentication devices (e.g. SecureID tokens) that are intended for individual use to gain access to a system
- Remain cautious when opening email attachments and follow the process of “think before you click”
- Use collaboration tools like instant messaging on 29Bison products only with prior authorization
- Respect company security controls and access information only within our authorization level
- Use personal devices to store or access company data only with prior approval
- Report any suspected breaches or incidents to a Partner or 29Bison’s outside counsel

Safeguarding our assets

We use company assets properly and protect them against loss, theft, misuse, damage, and waste.

Why it matters

29Bison computers, phones, office supplies and facilities exist to help us all maximize our performance as individuals, as a team, and as a business. By respecting these assets, we ensure they remain accessible and fully functional when our customers and colleagues need them. We also help make sure company time and resources are spent on positive initiatives, rather than fixing preventable problems.

How we deliver

We use company assets for legitimate and authorized business purposes only. We consider misappropriation, carelessness, or waste of assets to be a breach of our duty and the taking of assets from company property without permission to be theft. This means we:

- Access company systems or information only when we are authorized and enabled to do so
- Never use company assets for illegal activities
- Limit personal use of company assets to situations when it does not interfere with our work and does not violate this Code
- Prevent improper third-party use of company property
- Immediately report any loss, theft, misuse, damage, or waste
- Stop using all 29Bison assets in our possession or that we have access to and return them if we leave the company

Our controls

Accurate financial records

We maintain records that are in accordance with company accounting policies and legal requirements.

Why it matters

When we each take accountability for ensuring the financial records that we handle are accurate and complete, we protect the company's reputation for integrity and uphold our commitment to trust. Reliable financial reporting allows stakeholders to fairly assess our performance, provides management with information to allocate our resources most effectively and prevents violations.

How we deliver

We produce accurate, fair, and timely records for management, advisors, stakeholders, government regulators and others. This means we:

- Take personal responsibility for ensuring all books and records – including timesheets, sales records, and expense reports – are complete, accurate, and documented
- Never keep unrecorded, undisclosed, off-the-books records
- Do not falsify or distort facts of any transaction
- Record and disclose transactions in a timely manner, supported by appropriate documentation
- Exercise reasonable diligence when approving transactions and expenditures or signing documents
- Understand the importance of internal controls and consistently comply with them;
- Pay business-related expenses with company funds only if we have authorization from our supervisor, manager, or a Partner
- Provide full, fair, accurate, timely and understandable disclosures in public communications and in reports or documents that we file with or submit to regulatory authorities
- Prepare disclosures in accordance with 29Bison's disclosure controls and procedures and other internal policies

Raising concerns

We have a responsibility to raise good faith concerns about questionable accounting, auditing, disclosures, or controls. Employees should raise concerns about accounting, internal accounting controls, auditing matters and disclosure controls with a Partner or 29Bison's outside counsel. It is unlawful to fraudulently influence, coerce, manipulate, or mislead any independent public or certified accountant who is auditing or preparing our financial statements.

Managing our records

We properly maintain and dispose of electronic and physical records.

Why it matters

29Bison generates and reviews business, employee and financial records for us and our clients and partners every day. The records must be created, stored, and disposed of according to strict

legal and regulatory requirements. When we can access records in a timely fashion, we provide better and more accurate service to our stakeholders and we avoid risks around audits, regulatory issues, or litigation. At the same time, records kept past their disposal dates can create avoidable information security, privacy, or legal risks.

How we deliver

We care for, store, retrieve and dispose of our business records according to applicable records management policy. This means we:

- Consistently organize our filing, storage, and retrieval of electronic and hard copy information
- Use the proper storage method specified by legal, fiscal, regulatory, or operational requirements
- Protect records from loss, damage, or deletion, and back them up regularly
- Retain all records related to any pending or threatened litigation or government investigation until otherwise directed by our outside counsel
- Dispose of all records (electronic and physical) according to retention and disposal schedules

It may be a criminal offense to destroy or falsify documents or e-mails related to a legal proceeding. Contact a Partner or 29Bison's outside counsel if you have questions about retention policies. If you have legal questions about whether a document should be retained, contact our outside counsel.

Contract authorization

We sign contracts or agreements on behalf of 29Bison only if we are authorized.

Why it matters

29Bison is subject to different laws and regulations in all the places we operate. Even small errors or miscommunications made in contracting can mean that we do not deliver what the client expected, cannot get paid, or are vulnerable to delays, legal action, or fines. These issues can also fracture the precious trust we have built with our clients and business partners. Each of us should be involved in the contracting process only if we have been authorized and are experienced in doing so.

How we deliver

We strive to deliver and receive what was promised in our contracts and agreements. This means we:

- Consult with the 29Bison designee with accountability for purchasing and procurement before making any contract commitments
- Enter into contracts or agreements or make proposals on behalf of 29Bison only if we have proper authorization
- Do not provide unapproved non-standard terms or unauthorized "side-letters" to customers or business partners
- Ensure complete, accurate documentation of contracts, related orders, and customer status in applications to process customer accounts

- Follow the rules that govern public procurements when providing products and services to governments

The media and using social media responsibly

We speak and post on social media on behalf of 29Bison with care and only if we are authorized to do so.

Why it matters

We are fully aware of the power of the media and our responsibility to use it wisely. Our company's reputation and ability to compete can be affected by the information we make public. By being aware of the risks and not appearing to speak for the company without authorization, we can help make sure the company gets an accurate message across to its intended audience while also exercising our individual right to post independently on social media.

How we deliver

If we receive requests for information from outside of the company, even seemingly simple ones, we refer them to colleagues authorized to act as company spokespersons. The spokespersons:

- Handle requests from the media, stakeholders, financial analysts, and government authorities
- Disclose information according to the requirements of regulatory authorities and government agencies
- Ensure that the information disclosed is accurate and that 29Bison is ready to make it public

Social Media

29Bison recognizes and encourages active participation in social media and online communications. We do so responsibly. This means we:

- If writing personally and there is any risk of confusion, however slight, make it clear that the views expressed are personal and not the company's views
- Unless authorized by the company to do so, do not reveal confidential data or sensitive information about the company or its clients, vendors, or suppliers
- Are careful to avoid discussion company trade secrets, contracting, upcoming product or service releases or any other proprietary information
- Act sensibly and follow the social media guidelines if we post externally about fellow employees, clients, vendors, or suppliers
- Do not create 29Bison or other branded social media channels without Partner approval;
- Make sure the time and effort we spend on social media does not interfere with our job duties
- Are mindful of what we post, even when it is not related to 29Bison

Be aware that team (herd) members in certain jobs may have supplemental policies regarding social media. If you have any additional questions on personal or corporate social media use, please ask for guidance from a Partner.

Being a responsible global corporate citizen

We respect human rights and our environment and hold our business partners to the same high standards we demand of ourselves.

Why it matters

We are committed to treating our colleagues with dignity and respect, and we expect our business partners to do the same. This cultivates a safe, skilled, and reliable workforce and it fosters trust and effective partnerships. We are committed to protecting and preserving the environment and seeking sustainable sourcing solutions. We take these commitments and responsibilities seriously, knowing that they are core to our principles.

How we deliver

Human rights

We strive to protect human rights and worker rights wherever we do business. This means we:

- Comply with local labor laws and practices and maintain our own high ethical standards of worker treatment
- Do not condone or use forced or child labor, or engage in human trafficking or slavery;
- Engage workers based on recognized employment or independent contractor relationships in accordance with local law
- Provide clear information about wages and benefits to workers before they are hired;
- Ensure wages and benefits comply with applicable laws
- Respect workers' rights to associate freely, join or form unions or works councils, and bargain collectively in accordance with local law
- Work with high-quality suppliers and other business partners that have committed to operating under ethical standards equivalent to our own

If you believe you have encountered a violation of our human rights standards, either in our workplaces or involving one of our business partners, contact your supervisor, manager, a Partner or our outside counsel.

Environmental responsibility

We are committed to limiting our environmental impact. By managing our resources and seeking sustainable solutions, we can ensure a better future for everyone. This means we:

- Comply with all applicable environmental laws and regulations, meeting or exceeding their requirements
- Know and follow all company policies and procedures aimed at ensuring environmental safety and resource efficiency
- Understand the potential danger and safe practices of any hazardous and/or regulated materials before allowing them into our workplaces
- Seek opportunities to support conservation and recycling in our workplaces
- Take responsibility as individuals to find new ways to make our workplaces more sustainable

If you have environmental safety concerns or if you have ideas on how to increase our sustainability or bolster or conservation efforts even more, please speak with your manager or a Partner.

Responsible sourcing and supply chain ethics

We actively seek suppliers and business partners who share our ethical standards and commitments to environmentally sound and sustainable practices. This means we:

- Perform due diligence on third-party suppliers
- Include renewable energy, pollution control and sustainability among the factors in our process of choosing suppliers
- Actively promote a diverse supply chain that reflects our labor markets, employee base, clients, and partners, giving preference to qualified suppliers who are female, veteran and/or minority-owned and operated, are designated public benefit organizations, and/or are local/community-based businesses
- Makes prospective and current suppliers aware of our supply chain ethics and seeks their commitment to following it

Contributing to our communities

We support the communities where we live and work by investing in people and projects that make a positive difference.

Why it matters

29Bison has a broad reach and relies on local relationships and resources for support. When we improve our communities, we can improve the lives of our current and future workforce, as well as the lives of our clients and other stakeholders. By seeking worthy causes to support and inviting collaboration and open communication, we can help our communities grow and succeed with us.

How we deliver

We collaborate with our colleagues and partners to support our communities and encourage charitable work. This means we:

- Listen to the concerns of community members and work together on solutions
- Connect 29Bison to charitable causes only with prior approval
- Reward our colleagues' commitment to serving communities through key programs and celebrate exceptional efforts in the community
- Offer all regular employees time off for volunteering consistent with regional or other policies that govern volunteering

If you have a community cause or event you think the company might be interested in supporting, contact your supervisor, manager, or a Partner.

Participating in the political process

We support and respect each other's individual right to take part in political activities while keeping 29Bison separate from any political activity.

Why it matters

The political process can be an effective way to create positive change in our world. However, rules regarding companies' political donations are often strict. Therefore, we must make sure 29Bison is not mistakenly connected to any political group or activity.

How we deliver

Although we encourage our herd members to responsibly participate in politics and civic matters as individuals, 29Bison does not support any political party, candidate, group, or religion (i.e., a "political cause"). This means the company:

- Never makes contributions to any political cause as a company
- Never requires any employee to contribute to, support or oppose any cause
- Does not express preference for or support, directly or indirectly, any political cause or take sides in international conflicts or disputes
- Is careful not to align 29Bison or its businesses with any political cause or with a particular side in any dispute
- Obtains prior approval from a company lawyer before taking an external position on advocacy – for example, joining a business consortium on a particular initiative

Lobbying

At times, we may discuss various issues and topics with government officials that could impact our business, regulators, and politicians. When these discussions focus on the possible impact or proposed laws, rules, or regulations on our business, we adhere to the principles in the Code and obtain guidance and prior approval from our outside counsel before taking an external position on potential legislation. If we do take a position, we clearly identify ourselves as lobbyists and follow all applicable lobbying laws, restrictions, and regulations.

Personal political activity

If we plan to campaign for or serve in political office as individuals, we are careful to separate ourselves from 29Bison in these efforts. This means we:

- Notify a partner and 29Bison's outside counsel about plans to run for office and excuse ourselves from any political matters involving 29Bison
- Do not pressure or influence coworkers, clients, or business partners whom we know through our job at 29Bison in ways related to our own personal political activity
- Do not reimburse employees or increase compensation to make up for personal political contributions
- Abide by laws and regulations in those states and countries that limit political contributions by employees of their family members
- Take particular care to make it clear that our political activities and expressed political views are personal and not those of 29Bison

In Closing

29Bison is committed to creating a unique and high value experience for each of the clients with whom we do business. Our commitment to each member of the herd is the same—to create a unique and high value work experience where you can grow professionally, feel respected and valued as an individual, and have an opportunity to expand your knowledge and skills. The Code of Conduct facilitates our ability to create this environment and we are glad that you have chosen to support it.