

CODE OF CONDUCT

COMPLIANCE WITH LAW

Mazzeschi shall comply with any and all laws, regulations, ordinances and such other legal requirements (collectively, "Laws"), as applicable to their organization and activities.

Mazzeschi shall maintain all applicable business and professional licenses or other authorizations to conduct its activities and to provide services including without limitation, such licenses or other authorizations of all Personnel.

Mazzeschi shall not permit any person who a) at any time, has been arrested, charged with or convicted of a crime involving acts of bribery, corruption, dishonesty, in connection with terrorism, money laundering, or in violation of export controls, or b) does not hold a current a license or other authorization, if necessary, to participate in providing services to Mazzeschi or its clients.

ETHICAL CONDUCT

Mazzeschi shall adhere at all times, to the highest standards of honest and integrity, and act in a proper and professional manner so as to avoid any appearance of impropriety. Suppliers and their personnel shall be truthful and accurate in all communications with Mazzeschi and its clients and in all filings and representations made to government agencies or other third parties in connection with services performed on behalf of Mazzeschi and its clients.

ANTI-BRIBERY

Mazzeschi shall at no time engage or participate in any form of corruption or bribery, including, without limitation, the payment of money, compensation or benefit to a government official for the purpose of improperly influencing decision-making or in violation of law. Similarly, in no event shall Mazzeschi be the recipient of any kickbacks or inappropriate gift or gratuities. Mazzeschi may not make or receive donations or gifts in Mazzeschi's or a client's name.

MONEY LAUNDERING

Mazzeschi shall at no time engage or participate in financial transactions to conceal the identity, source, and/or destination of money.

ANTI-TERRORISM

Mazzeschi shall at no time engage or participate in any transaction with an individual or organization designated by any international bodies , as a terrorist, terrorist organization, or a supporter of a designated terrorist organization, or any transaction in violation of applicable export controls or sanctions provisions implemented by international bodies.

PRIVACY AND DATA PROTECTION

Mazzeschi shall use, maintain and process personal information consistent with applicable privacy and data protection requirements in force.

CONFIDENTIAL AND PROPRIETARY INFORMATION

Mazzeschi shall protect applicable proprietary and confidential information and intellectual property belonging to its clients from unauthorized use, access or disclosure.