

# Policy statement on ethical business practices in Tether Technology Ltd

## 1. Policy statement

It is a fundamental policy of the company to conduct its business with honesty and integrity and in accordance with the highest legal and ethical standards. The ethical business practices policy set forth in this document provides guidance in specific situations. It is not possible to provide guidance for all situations that may arise; therefore, it is the individual employee's responsibility to exercise good judgment to act in a manner that will reflect favourably upon the company and the individual. Employees and contractors shall comply with the spirit as well as the letter of this policy. Employees and contractors shall not attempt to achieve indirectly, through the use of agents or other intermediaries, anything that is directly forbidden.

## 2. Scope

This policy applies to any employee or contractor that represents Tether Technology Ltd, whether employed or contracted by Tether Technology Ltd or by the parent or third-party organisation.

## 3. Implementation

All managers are responsible for both ensuring that employees under their supervision are familiar with the policy and for promoting compliance with the policy. Employees having questions on how to proceed or on interpretation should consult their line manager or the Quality Manager.

Internal audits will review compliance to this policy, which is essential. Violations will result in disciplinary action, including dismissal where warranted.

### Use of company assets

The use of any funds or assets of the company for any unlawful or improper purpose is strictly prohibited. Protecting company assets, which specifically include intangible assets such as customer accounts and intellectual property related to Tether Technology Ltd processes and systems, is critical. All employees are personally responsible for protecting the property entrusted to them and for helping to protect the company's assets in general.

All employees should be alert to any situations or incidents that could lead to the loss, misuse, or theft of company property and report all such situations to the quality department or their manager as soon as they come to their attention. Company proprietary information is any information that is owned by the company. Much of the proprietary information is confidential and gives the company a competitive advantage. It may also be subject to copyright, patent, or other intellectual property or legal rights. Proprietary information includes such things as: technical or scientific information relating to current and future products, services, or research; business or marketing plans or projections; earnings and other financial data; personnel information, including executive and organizational changes; and software. It is critical that no employee discloses or distributes that information except as authorised by the company and that all employees follow all company safeguards for protecting that information.

No payment from the company's funds or assets shall be made to or for the benefit of a representative of any domestic or foreign government (or subdivision thereof), labour union, or any current or prospective customer or supplier for the purpose of improperly obtaining a desired government action, or any sale, purchase, contract, or other commercial benefit. This prohibition

applies to direct or indirect payments made through third parties and employees and includes bribes, kickbacks, or any other form of payoff.

Nothing of value (for example, gifts or entertainment) may be provided to government personnel unless clearly permitted by law, any applicable regulation, and this policy. Commercial business entertainment that is reasonable in nature, frequency, and cost is permitted. Reasonable business entertainment would cover, for example, a lunch, dinner, or occasional athletic or cultural event; gifts of nominal value (approximately £150 or less); entertainment at facilities of the company; or authorised transportation in the company's vehicles. In addition, reasonable business entertainment covers traditional promotional events sponsored by the company.

## Conflict of interest

A conflict of interest is deemed to exist whenever an employee is in a position, as a result of the nature or responsibilities of his or her employment with the company, to further any personal financial interest of the employee or a member of the employee's immediate family. No employee or contractor should place themselves in a position that could be construed as a conflict of interest but must inform their manager as soon as they identify that they have been inadvertently put themselves in such a position.

## Accounting

The company's books and accounts will at all times reflect the company's true financial position and no attempt will be made to hide or mask any statement that may allow a third-party to inaccurately assess the company's affairs.

## Employee privacy

The company collects and maintains personal information which relates to the employment of its contractors and staff, including medical and benefit information. Access to such information is restricted to people with a need to know. Personal information is normally released to outside parties only with employee approval, except that the company may release personal information to verify employment, to conduct basic security checks, business, or legal reasons. Employees who have access to personal information must ensure that the information is not disclosed in violation of any law or company policy or practice.

## Reporting violations (whistleblowing)

All employees of the company are responsible for bringing violations of this policy to the attention of the senior company management. The company warrants that no action, implied or other that may disadvantage the person reporting the violation will be tolerated and will not affect any element of that person's employment with the company.