

Kensing Code of Business Conduct

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MESSAGE FROM THE CEO

Every employee of Kensing (“Kensing”) has the power to influence our company’s reputation, everywhere we do business, every day. The success of our business is dependent on the trust and confidence we earn from our employees, customers, suppliers, neighbors, and vendors. This trust is our most important asset. It is our brand. It is our reputation. We gain credibility by adhering to our commitments, displaying honesty, dignity, and integrity, and reaching company goals solely through honorable conduct. It is vital that we act ethically and with integrity, not only to maintain our reputation and comply with laws and regulations, but also because it is simply the right thing to do. We live at a time of radical transparency. A time when anything we do can hit social media anytime, anywhere. The only way to succeed in the 21st century is simply to do business in a way that we can always be proud of, whomever is looking over our shoulders, whomever regulates us. This is what we want to be: proud of our actions and decisions under any circumstances.

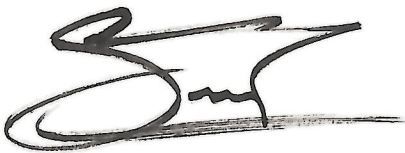
Building and maintaining our reputation is up to every one of us. At times, we are all faced with difficult decisions and issues we would prefer to avoid. Sometimes, we hope that if we avoid confronting a problem, it will simply go away.

At Kensing, we must have the courage to tackle the tough decisions and make difficult choices, secure in the knowledge that our Company is committed to doing the right thing. At times this will mean going above and beyond what the law requires. Merely because we can legally pursue a course of action does not mean we should do so.

To help you be successful in this endeavor, we have created this code of conduct. Although these guiding principles cannot address every issue or provide answers to every dilemma, they can define the spirit in which we intend to do business and should guide us in our daily conduct. We want you to feel empowered to do the right thing in all circumstances.

I expect that you will review and become familiar with the elements of this code of conduct so that you will be equipped with the information to help you make fair and honest decisions. If you are ever in doubt or need to raise concerns about possible violations of law or this code of conduct, please contact your manager, human resources, or our legal team. Speaking up is imperative to our success and addressing issues that can affect us all.

Join me in our shared commitment to upholding our high ethical standards together.



Serge Rogasik
Chief Executive Officer

INTRODUCTION

Importance of a Code of Conduct

At Kensing, we take pride in doing business following the principles of honest and ethical conduct of all employees. We believe that it takes more than strong business results to build a great company. Our reputation for integrity and excellence requires careful observance of the spirit and letter of all applicable laws and regulations, as well as conscientious regard for the highest standards of conduct. Our continued success depends upon the trust of our customers, suppliers, shareholders, our fellow team members here at Kensing, and the communities where we live and work. We are dedicated to preserving that trust.

The employees of Kensing have created a culture where integrity is of the utmost importance and unethical behavior is not tolerated. Employees have a duty to refrain from any conduct that is illegal, dishonest, or unethical in appearance or in fact. We expect anyone who works for or represents Kensing to conduct business in accordance with the letter, spirit and intent of all relevant laws and regulations.

This *Code of Business Conduct* (“Code”) reflects the essential elements of ethical business conduct necessary for the Company’s future success. We use these elements in working together as members of the Kensing team and with the Company’s key stakeholders.

Who Does the Code Apply To?

The Code of Business Conduct applies to everyone at Kensing - officers, directors, and team members at all levels. It also applies to subsidiaries and controlled affiliates, as well as in joint ventures (“JVs”) to the extent reasonable given Kensing’s level of participation. In situations where applying this Code is not possible, we will strongly encourage JVs or non-controlled affiliates to adopt and follow similar principles.

Employees working with third parties such as consultants, agents, sales representatives, distributors, independent contractors, etc. must require these parties to agree to comply with relevant aspects of the Company’s compliance policies, to include action, up to and including termination of a contract after learning that a third party failed to abide by Kensing compliance policies. Kensing will inform these parties about the policy requirements.

Use of the terms “the Company” and “Kensing” throughout this document refers collectively to Kensing, its subsidiaries, and controlled affiliates.

What Must Employees Do?

Using the Code to guide our actions allows us to preserve our reputation for doing business the right way. To this end, each of us must:

BE KNOWLEDGEABLE

- Read and understand the Code.
- Learn the details of any aspect of the Code which is relevant to your individual job responsibilities.
- Complete training on the Code and other assigned educational courses in a timely manner.

BE COMMITTED

- Abide by the Code.
- Seek advice and guidance when we are not sure of a situation.
- Promptly raise any concerns about violations or potential violations.
- Cooperate fully and honestly in investigations.

BE AWARE

- Understand that Kensing may review, audit, monitor, intercept, access and disclose information processed or stored on Company equipment or technology, or on personally owned devices permitted Company network access.

Holding a management position at Kensing means accepting an additional set of responsibilities. We expect our managers to demonstrate a strong commitment to leadership and creating a culture of compliance. If you are a manager, you should:

PREVENT

- Personally set the example for integrity, not just through words, but more importantly, through actions.
- Ensure all team members know and understand this Code, Company policies, and the laws that apply to your area of responsibility.
- Create an open environment in which every employee feels comfortable asking questions and raising concerns.
- Understand the risks that exist in your area of responsibility and ensure appropriate controls are in place to mitigate those risks.

DETECT

- Implement control measures and use diligence when reviewing records in your area of responsibility to detect heightened compliance risks and violations.

RESPOND

- Report any violations that you suspect are occurring.
- Promptly escalate reports from employees.

Our Code and the Law

Kensing operations and team members are subject to the laws of many countries and other jurisdictions around the world. We are all expected to comply with the Code and all applicable government laws, rules, and regulations. If a provision of the Code conflicts with applicable law, always apply the most stringent standard. If you are uncertain what laws apply to you, or if you believe there may be a conflict between different applicable laws, consult your management or a member of the Kensing Executive team before proceeding.

What are the Consequences of Violating Our Code?

Violations of our Code, policies, or the law may carry serious consequences for Kensing, and the individuals involved. We are each accountable for our actions. Employees and leaders who engage in unethical or illegal behavior, and those who direct, condone, approve, or facilitate such behavior, will be subject to disciplinary action, up to and including termination; subject to local laws; and in some instances, may be subject to prosecution by governmental entities. Our disciplinary process seeks to treat employees with dignity and respect, and disciplinary measures will be proportionate and consistently applied.

There is a cost to non-compliance. The following non-exhaustive list of examples of conduct, which may result in disciplinary action, includes:

- Violating law or Kensing policy or requesting that others do the same.
- Retaliating against another employee for reporting a concern.
- Failing to promptly report a known or suspected violation of the Code.
- Failing to fully and honestly cooperate in investigations of possible policy violations.
- Failing to demonstrate leadership and diligence to ensure compliance with Kensing policy and law.

REPORTING CONCERNS

Seeking Advice or Reporting Concerns and Violations

Being the voice of integrity isn't always easy, but when we raise concerns, we make our Company stronger and protect our colleagues from harm. You have an obligation to promptly raise a concern when you see a situation in which the principles of our Code are not being followed, even if there is uncertainty on whether a violation has actually occurred. Timely reporting may be critical in preventing harm.

Never hesitate to ask for help if you don't know what to do. Kensing offers several methods for raising concerns or asking a question. Generally, your supervisor or manager will be in the best position to resolve any concerns, but other resources include Human Resources Representatives, Human Resources Managers, and the Legal Team. You may anonymously report any concerns through the following channels of communication:

- Call – 1 (833) 739 1950
- Email – KensingEthicsHotline@operationsinc.com
- Website – <http://www.kensingsolutions.com>

How We Handle Investigations

If you believe you have experienced or witnessed harassment, discrimination, or retaliation in violation of this Code, the Company's Employee Handbook policies, or the law, you should immediately report the offending behavior to your manager or Human Resources. Managers are required to immediately report any violation of the Company's Code of Conduct and/or the Company's anti-discrimination, anti-harassment, and anti-retaliation policies to Human Resources.

Kensing takes all reports of possible misconduct seriously. The Company will investigate the matter promptly and appropriately to determine whether the Code, Company policy, or the law has been violated. Each workplace investigation may require a different level of discretion or investigation plan. The Company will endeavor to protect the privacy and confidentiality of all parties involved to the extent reasonably possible for resolution to protect the integrity of the investigation and the privacy of affected employees. Information will be shared on a need-to-know basis. However, some disclosure may (and likely will) be necessary for the Company to affect a meaningful investigation and appropriate remedy and/or to protect the safety of the workplace.

If you are asked to participate in an investigation, cooperate fully, in good faith, and answer all questions completely and honestly. It is Company policy to ensure that all investigations are conducted in compliance with applicable laws. Once the investigation is complete, it will be communicated to you as soon as practical.

No Retaliation

We value your help in identifying potential problems that the Company may need to address. We believe it is important that employees aren't afraid to speak up about any issues. Therefore, Kensing strictly prohibits any form of retaliation against an employee for bringing a concern to the company's attention in good faith, even if the investigation determines that no violation could be substantiated. Similarly, the Company will not tolerate retaliation against an employee or other person who cooperates in an investigation. If you ever feel that you have been retaliated against or threatened with retaliation, promptly report the matter to your direct supervisor, Human Resources, or any of the additional channels listed above.

HUMAN RIGHTS

Kensing wants to ensure our employees can thrive in an inclusive workplace free from all forms of discrimination and harassment based on sex, race, color, religion, disability, age and any other characteristic or conduct protected by applicable law. We strive to protect our employees against inappropriate actions that are unwanted and/or unwelcome and/or which create an intimidating, offensive, or hostile work environment.

Harassment

Harassment has no place at Kensing and will not be tolerated. Harassment includes all inappropriate conduct that creates a disrespectful, intimidating, hostile, degrading, humiliating, or offensive environment based on actual (or perceived, as applicable) legally protected characteristics or conduct, such as an individual's race, color, religion, gender, sex, pregnancy, national origin, ancestry, age, disability, pregnancy, veteran status, sexual orientation, gender identity, gender expression, marital status, military discharge status, genetic information, citizenship status or work authorization status as well as any other protected characteristics under applicable law.

The Company's anti-harassment policy provided in Kensing's Employee Handbook applies to all persons involved in its operations, regardless of their position, and prohibits harassing conduct by any employee of Kensing, as well as from managers, suppliers, contractors, customers or other third parties with whom employees may interact in furtherance of their job. Harassment can range from extreme forms such as violence, threats, or physical touching, to less obvious actions like ridiculing, teasing, or repeatedly bothering coworkers or subordinates or refusing to talk to them. Examples of harassment may include, but is not limited to, behavior, such as:

- Verbal conduct including taunting, jokes, threats, epithets, derogatory comments, or slurs based on an individual's legally protected status.
- Visual and/or written conduct including derogatory posters, photographs, calendars, cartoons, drawings, websites, social media, emails, text

- messages or gestures based on an individual's legally protected status.
- Physical conduct including assault, unwanted touching or blocking normal movement because of an individual's legally protected status.
 - Bullying or mobbing, which includes systematic, sustained, or repeated hostile behavior, either in-person or through email, social media, and other digital communications, intended to humiliate, isolate, or exclude an individual.

This list is not exhaustive and there may be other behaviors that constitute Harassment. A single incident that has a lasting harmful effect on a coworker, or a series of incidents may be Harassment.

For more information, consult the Harassment policy included in the Employee Handbook or contact your manager or Human Resources.

Sexual Harassment

Sexual harassment includes various forms of offensive behavior based on sex, including unwelcome sexual advances, unsolicited sexual attention, requests for sexual favors, and other verbal or physical conduct of a sexual nature when this conduct explicitly or implicitly affects an individual's employment, unreasonably interferes with an individual's work performance, or creates an intimidating, hostile, or offensive work environment. Examples of sexual harassment occur, but are not limited to, when:

- Submission to such conduct is made a term or condition of employment; or
- Submission to, or rejection of, such conduct is used as a basis for employment decisions affecting the individual; or
- Such conduct has the purpose or effect of unreasonably interfering with an employee's work performance or creating an intimidating, hostile or offensive working environment.

For more information, consult the Sexual Harassment policy included in the Employee Handbook or contact your manager or Human Resources.

Diversity

We embrace and celebrate the unique experiences, perspectives, and cultural backgrounds that each employee brings to our workplace. Kensing strives to foster an environment where our employees feel respected, valued, and empowered, and our team members are at the forefront in helping us promote and sustain an inclusive workplace. An inclusive global culture allows us each to contribute our best to the team. Diversity is about capitalizing on each of our strengths and minimizing our weaknesses, allowing us to achieve together what we could not as individuals.

Fair Employment Practices

Fair employment practices do more than keep Kensing in compliance with applicable labor and employment laws. They contribute to a culture of respect. Kensing is committed to complying with all laws pertaining to freedom of association, privacy, collective bargaining, immigration, working time, wages, and hours, as well as laws prohibiting forced, compulsory and child labor and employment discrimination. Beyond legal compliance, we strive to create an environment considerate of all employees wherever Kensing business is being conducted.

Discrimination

As stated in the Discrimination policy included in the Employee Handbook, the Company is committed to equal employment opportunity and does not tolerate discrimination in hiring, compensation, or promotion opportunities based on race, color, sex (including pregnancy, childbirth, lactation or other related medical condition), ethnicity, religion, gender, gender identity or expression, sexual orientation, age, mental or physical disability, medical condition, genetic information, ancestry, veteran or military status, national origin, citizenship status or any other status protected by applicable law.

Privacy

A growing number of countries are more stringently regulating the collection and use of employees' and consumer's "personal data," although the types of data covered, the nature of the protection, and local enforcement mechanisms vary. We all provide various types of personal data to the Company, and we all share the responsibility for ensuring that this data remains secure and confidential. Personal data is any information that directly or indirectly identifies a person. This information may include:

- Name
- Home and office contact information
- Government-issued identification numbers
- Marital status
- Medical history
- Other data

Kensing is committed to handling personal data responsibly and will use, maintain, and transfer personal data in accordance with Company policies and applicable privacy law. If you have access to this information, ensure that you access only the information that is necessary for your job responsibilities, and that you always understand and comply with relevant privacy laws.

If you learn that personal data has been used in violation of our privacy practices, or if you learn that the security of any system or device containing personal data has been compromised, immediately notify your manager, human resources, or company legal counsel.

Freedom of Association and Right to Collective Bargaining

Kensing has a strong and continuing commitment to meet or exceed the needs of its team members. Our policies and practices are designed to support an empowered and highly motivated workforce in an environment marked by open, honest communications and respect for every team member. Kensing will uphold the freedom of association and recognize the right to collective bargaining, consistent with applicable laws, and will honor all its legally mandated obligations.

Human Trafficking, Forced or Compulsory Labor, Child Labor

We uphold individual human rights including freedom from forced or compulsory labor and stand firmly against human trafficking. We seek to provide a safe, healthy, and desirable workplace with working conditions, wages, and benefits that meet or exceed applicable laws and reward performance. Kensing complies with all child labor laws and supports the elimination of unlawful child labor and exploitation. We expect the same ethical conduct from our business partners.

Working Hours and Compensation

As stated in our workplace policies included in the Employee Handbook, our Company meets its obligations to employees by providing proper working hours and wages, including overtime pay consistent with local law. This includes equal compensation for work of equal value, without distinction based on any category protected under federal, state, or local law.

CONFLICTS OF INTEREST

Employees should avoid and prevent actions that may conflict with your responsibilities to Kensing or hurt the Company's reputation. Even when nothing wrong is intended, the appearance of a conflict of interest can have negative effects. It is crucial to consider how your actions might appear, and to avoid actual, or perceived, conflicts of interest.

What is a Conflict of Interest?

A conflict of interest arises when your personal interests or activities influence, or appear to influence, your ability to act in the best interests of Kensing. Our policy contained in the Employee Handbook requires that a Conflict Waiver be submitted to legal counsel before engaging in any activity, transaction or relationship that might give rise to a conflict of interest.

Determining whether a conflict of interest exists is not always easy to do. Employees with a conflict-of-interest question should seek advice from management or legal counsel.

The following is a non-exhaustive list of examples that are generally considered to be prohibited conflicts of interest:

- Acting as a director, officer, consultant, agent or employee of a supplier, customer, competitor, or any entity that engages in business with the Company.
- Owning a material interest in or being a creditor of or having other financial interest in a supplier, customer, competitor, or any entity that engages in business with the Company.
- Receiving from or giving to any supplier, customer or competitor gifts, gratuities, special allowances, discounts or other advantages not generally available to employees of the Company.
- Having any significant direct or indirect personal interest in a business transaction involving the Company.
- Conducting outside activities that materially detract from or interfere with the full and timely performance of an employee's job duties for the Company.
- Influencing commercial transactions involving purchases, contracts or leases in a way that would have a negative impact on the Company or its business.

Employees may not authorize, execute, or approve any transaction in which we have a direct or indirect conflict of interest. A conflict of interest can also arise if a member of your household or a close personal acquaintance owns or works for a company that is one of Kensing's suppliers, customers, or competitors. If you find yourself in that situation, you must not use your position to influence the bidding process or negotiation in any way. If you are directly involved in supplier selection or approval of invoices, notify management immediately and remove yourself from the decision-making process.

Personal Interests with Customer and Business Partners

We may not benefit, or seek to benefit, as individuals from the relationships that Kensing has with its customers or business partners, including suppliers, vendors, contractors, agents, or distributors. Team members must be free from the influence of personal considerations when making recommendations or decisions.

Outside Employment:

Kensing respects each employee's right to engage in activities outside of employment such as those that are of a personal or private nature, to the extent that such activities do not create a conflict of interest or adversely affect the employee's ability to perform their job. An example of an activity that might adversely affect an employee's ability to perform their job duties is outside employment. While the Company does not prohibit employees from holding other jobs, the following types of outside employment are generally prohibited (to the extent allowed under applicable law):

- Employment that conflicts with the employee's work schedule, duties and responsibilities or creates an actual conflict of interest.
- Employment that impairs or has a detrimental effect on the employee's work performance with the Company.
- Employment that requires employees to conduct work or related activities during working times or using any of the Company's tools, materials, or equipment; and
- Employment that directly or indirectly competes with the business or the interests of the Company.

For the purposes of this section, self-employment is considered outside employment.

Financial Interest in Other Organizations

We must ensure that our personal investments do not put us in competition with Kensing. As Kensing employees, none of us may have a significant investment or other financial interest in the business of a customer, a supplier, a competitor, an agent, a distributor, or an actual or potential participant in a transaction or other business venture involving Kensing. This restriction also applies to members of our households and our close personal acquaintances.

Relatively small investments in the securities of publicly owned corporations would not normally be considered a violation. Similarly, we may not own or work for a business that provides services to Kensing, unless we receive prior written approval through a Conflict-of-Interest Waiver. Again, this also applies to members of our households and our close personal acquaintances.

Serving on Boards for Other Companies

We must also refrain from serving in any capacity—including as a director, officer, partner, consultant, employee, distributor, or agent—for companies that compete or do business with Kensing, unless the relationship is disclosed and approved in advance by legal counsel. Under certain circumstances, approval will also be needed from a member of the Kensing Executive team. Positively impacting your community by serving on a board of directors for a charitable organization or professional association is encouraged and does not require prior approval. However, you should only accept a position if it does not interfere with your ability to perform your job.

Personal Relationships with Other Employees

Close personal relationships between team members outside of working hours and off Company property are generally outside of the consideration of Company policy. However, Company policy prohibits:

- Relationships that become a disruption in the workplace.
- A manager engaging in a relationship with anyone in his or her line of supervision.

- A manager supervising a family member or someone living in his or her household.
- Relationships in which one team member can influence another team member's employment or termination decisions, job benefits or pay, assignments, promotions, performance reviews, discipline or any other employment term or condition.

A "close personal acquaintance" includes any individual with whom you share a close personal relationship and from whom you could benefit financially either directly or indirectly, immediately or at some time in the future. Examples may include members of your extended family, individuals with whom you share a cultural closeness such as godparents, lifelong friends, or others living within that person's household.

BUSINESS COURTESIES

Kensing is committed to competing solely on the merit of our products and services. We should avoid any actions that create a perception that favorable treatment of outside entities by Kensing was sought, received, or given in exchange for personal business courtesies. Business courtesies include gifts, gratuities, meals, refreshments, entertainment or other benefits from persons or companies with whom Kensing does or may do business. We will neither give nor accept business courtesies that constitute, or could reasonably be perceived as constituting, unfair business inducements that would violate law, regulation or policies of Kensing or customers or would cause embarrassment or reflect negatively on Kensing's reputation.

Giving and Receiving Gifts, Entertainment, and Travel Gifts

Exchanging gifts and entertainment can help build goodwill in business relationships. In many countries where we operate, these practices are an integral part of doing business. However, some entertainment or gifts can make it difficult for us to remain objective about the person or company we are dealing with. When interacting with business associates, we must be careful when offering, giving, or receiving gifts, providing meals or entertainment, and paying for travel.

Although we may not use our position at Kensing to obtain business courtesies, and we must never ask for them, we may accept unsolicited business courtesies only if the item is of reasonable value, complies with the recipient's own laws and corporate policies, and is not given with any corrupt intent to improperly influence business decisions. The prudent course is to refuse a courtesy from a supplier when Kensing is involved in choosing or reconfirming a supplier, or under circumstances that would create an impression that offering courtesies is the way to obtain Kensing's business.

Examples of a gift that may conform to the reasonable ethical practices of the marketplace include items such as:

- Flowers, fruit baskets and other modest presents that commemorate a special occasion.
- Gifts of nominal value, such as calendars, pens, mugs, caps, and t-shirts (or other novelty, advertising, or promotional items).

Generally, employees may not accept compensation or money of any amount from entities with whom Kensing does or may do business. Tangible gifts (including tickets to a sporting or entertainment event where the giver is not in attendance) that have a market value greater than \$100 may not be accepted unless approval is obtained from management.

Any gifts or entertainment provided to a third party must be properly reflected in our Company's books and records. Additionally, giving gifts and entertainment should not occur on a frequent basis. We are not permitted to provide or receive gifts or entertainment with the intent to inappropriately influence or induce business. In fact, such practices are not only against Company policy, but also may violate anti-corruption laws, and may be true regardless of whether we are giving or receiving.

Keep in mind that we and our family members may accept discounts on personal purchases of a supplier's or customer's products only if such discounts are offered to all other Company employees and approved by management.

A **gift** is any item of value given to or received from someone who is not an employee of Kensing. If the person providing the meal, tickets, or entertainment is not attending the event, it is considered a "gift" and it must meet Company guidelines for appropriate gifts.

Entertainment is a situation such as meal or event outside the workplace where both a representative from the giver and recipient are present. Providing or accepting entertainment may be allowed under the following:

- The purpose is to hold bona fide business discussions or to foster better business relations.
- It is consistent with acceptable business customs and practices.
- It is not illegal or in violation of the other party's ethical guidelines.
- It is of reasonable value and would be paid by normal expense account procedures.
- It is not solicited by the recipient.
- It cannot be construed as a bribe, payoff, or kickback.
- It is not provided or accepted on a repeated basis.
- It will not cause, or be perceived to cause, the recipient to alter normal business judgment concerning any transaction with the Company; and
- It will not be an embarrassment to the Company or the employee if publicly disclosed.

Some regions and business units have internal guidelines and policies that are more restrictive than those outlined above or require certain levels of approval for accepting or providing gifts or entertainment. In these situations, you must follow the applicable guidelines.

Travel

From time to time, there may be a justifiable business purpose for us to provide business travel for a third party or receive business travel from a third party. Any such travel is subject to special rules. You must follow the travel policies in your specific jurisdiction.

Special Circumstances

In situations where Company policies would not normally permit you to accept a specific gift, but local custom would make refusing the gift awkward or insulting, you may accept the gift on behalf of the Company, if reasonable and lawful. In this situation, immediately consult with management and human resources about the appropriate disposition of the gift.

If you are ever unsure about accepting or providing business courtesies (gift, entertainment, or travel) you should talk to your managers or human resources.

Inappropriate Gifts and Entertainment

Any form of gift or entertainment that could reasonably be expected to negatively impact the Company's reputation is prohibited. You should avoid excessive alcohol consumption when you are in social situations with business partners. Do not provide or accept entertainment at adult entertainment venues (including gentleman's clubs, any establishment with scantily dressed or nude performers, or any establishment offering services of prostitutes or sexually oriented entertainment) or paid sexual favors while on Company business, even if any expense is paid with personal funds.

Government Officials

Special restrictions apply when dealing with government employees and government officials. A government employee and government official mean an employee, official, or an elected or appointed member of an executive, legislative, or administrative body of a federal, national, state/provincial, or local government from any country. Consult with human resources to determine whether there are any special restrictions before engaging in a business relationship with any government or government-owned entity. Under no circumstances should any gifts, entertainment, meals, transportation, lodging, or other things of value be given to any government employee without prior, specific approval from human resources.

PROTECTION AND USE OF CONFIDENTIAL INFORMATION

Protection of Company Information

Kensing’s confidential and proprietary information is vital to its current operations and future success. Each employee should use all reasonable care to protect or otherwise prevent the unauthorized disclosure of such information.

In no event should employees disclose or reveal confidential information within or outside the Company without proper authorization or purpose.

“Confidential Information” refers to a piece of information, or a compilation of information, in any form (on paper, in an electronic file, or otherwise), related to the Company’s business that the Company has not made public or authorized to be made public, and that is not generally known to the public through proper means. “Confidential Information” also refers to the Company’s pricing systems, product profit margins, customer information (including contacts, lists and preferences), marketing strategies or techniques, distribution systems and networks, supplier information (including identity and contract arrangements), product content, product mix, product research and development efforts, manufacturing methods, formulations, research data, software, inventions, non-public financial information and information from or about the Company’s customers that the Company’s customers expressly wish, and may reasonably expect, to be kept confidential. The term “Confidential Information” also includes any information to which an employee had access by reason of the employee’s employment with the Company and which meets the definition of “trade secret” set forth in the Illinois Trade Secrets Act, 765 ILCS 1065/1, et seq., and/or the Defend Trade Secrets Act, 18 U.S.C. § 1836, et seq. The term Confidential Information does not include any information which (i) was publicly known or made generally available prior to the time of disclosure to the employee; or (ii) becomes publicly known or made generally available after disclosure to the employee through no wrongful action or inaction of the employee. We will not disclose confidential and nonpublic information without a valid business purpose and proper authorization.

Confidential and proprietary information includes such things as trade secrets, pricing, and financial data, Kensing business methods and plans, technology, intellectual property (such as trademarks, copyrights, patents, and inventions), research and development, customer lists and methods of competing, or nonpublic information about other companies, including current or potential supplier and vendors. This list is an example of the types of confidential or proprietary information and in no way represents a full listing. We will not disclose confidential and nonpublic information without a valid business purpose and proper authorization.

Our future growth depends in part on the success of our innovation efforts. Remember, any invention or other intellectual property you create while employed by Kensing that relates to the Company's existing or contemplated business is the exclusive property of Kensing.

Handling of Company Property (Physical Assets)

You are expected to handle company assets responsibly. From stationery and office furniture to computers and cars, there are many kinds of company property that enable us all to do our jobs to the best of our ability.

We regard it as fundamental to our values that all of us in Kensing should handle company property with due care and respect. It is equally important to be responsible in the way we deal with intangible assets, such as intellectual property rights, copyrighted material, financial records, logos, etc.

Our facilities, production lines, processes, and materials are highly valuable assets – for which we all share responsibility. We handle them with care, and ensure they are not damaged, wasted, or misused. Company computers, vehicles, internet access, mobile phones and other equipment are for work, not personal use – unless explicitly stated.

Confidential Information Provided by Other Companies

Kensing's policy is not to accept information that could be deemed confidential, restricted, or limited in its disclosure or use, unless a written agreement specifying the rights and obligations of all parties has been approved by the Company's Legal Department and signed by an authorized representative of each party.

A properly executed agreement ensures that Kensing business, research, development, and technical services are not compromised. Such an agreement can also prevent other parties from claiming an unwanted confidential relationship.

Until such an agreement is in place, you should refuse to discuss or accept the confidential information of others.

Examples of such confidential information could include:

- Unsolicited disclosures by outside inventors.
- Drawings and manuals that bear markings asserting confidentiality.
- Proprietary designs, processes, methods, systems, procedures, or formulas.
- Confidential financial information or business planning documents.

When dealing with confidential information provided by other companies, we commit to treating such information with the upmost care, protecting information on a strict need-to-know basis related to the project in scope. We will maintain the Disclosing Party's Confidential Information in strict confidence using the same or higher degree of care that we would use in protecting our own Confidential Information, and not less than the degree of care required by the law and internal policy.

Information About Other Companies

It is important that we respect the property rights of others. We will not acquire or seek to acquire improper means of a competitor's trade secrets or other proprietary or confidential information. We will not engage in unauthorized use, copying, distribution or alteration of software or other intellectual property. All forms of industrial espionage are prohibited. Kensing does not condone the disclosure of any confidential information of a competitor company by team members who formerly worked for such competitor.

Insider Trading

In the course of your job, you may learn of material information about Kensing or other companies before it is made public. Using this information for your financial or other personal benefit or conveying this information to others constitutes a violation of this Code and may even violate the law. Confidential Company information should never be used for personal gain. Employees may never buy or sell stock in a company while in possession of material nonpublic (inside) information about that company.

Using this information for your financial or other personal benefit or conveying this information to others constitutes a violation of this policy and may even violate the law. This includes buying or selling the securities of any company about which you have material non-public information and giving this "inside information" to anyone else who might base financial trades on the information you've shared.

Information is considered material if a reasonable investor would consider it important in deciding whether to purchase, sell, or retain a security. Information is nonpublic if it has not been made generally available to investors (by means of a press release, for example). Information that fits both descriptions is considered inside information.

Examples of inside information include:

- plans for mergers or significant acquisitions
- earnings and financial results prior to release
- news of major changes in senior management or organizational structure
- threatened litigation or changes in the status of an ongoing lawsuit
- gain or loss of important contracts or customers
- planned action regarding our stock
- product developments or discontinuations

In addition, if you possess inside information, you must not communicate, or tip, that information to family, friends, or others who may trade (or advise others to trade) regarding Kensing, or other Company's, stock. In addition to the restrictions indicated above, further restrictions apply to Kensing's officers and directors.

Contact the Legal Department if you have questions about the "Insider Trading" section of this Code.

External Communications and Requests

To ensure that Kensing communicates with the media in a consistent, timely and professional manner about matters related to the Company, you should notify a member of the Kensing Executive team that you have been contacted by the media whenever you are asked to speak on behalf of the Company so that the Company knows that a media inquiry has been made. Do not respond to media inquiries on the Company's behalf without authorization. No one may issue a press release without first consulting with a member of the Kensing Executive team. This requirement does not prevent you from speaking with the media, but you should not attempt to speak on behalf of the Company unless you have specifically been authorized to do so by an officer of the Company.

Similarly, only people authorized by the Chief Financial Officer or Investor Relations may speak on behalf of Kensing to members of the financial community, such as securities analysts, stockholders, or fund managers.

All marketing communications must follow the review and approval processes established by Marketing Communications. This includes marketing communications on the Company's web site, social networking outlets, and e-marketing campaigns such as search engine optimization, videos, banner ads, and webinars. These processes help ensure that Company communications are appropriately grounded in established standards of scientific inquiry and do not mislead stakeholders or inadvertently disparage competing products.

Social Media

The importance of consistent, accurate communication also applies to social media. Unless you have been trained and approved as a Company spokesperson, you should not speak on Kensing's behalf in any social media arena. Be aware of the following considerations:

- Personal social media entries concerning the Company should have clear disclaimers that the views expressed by the author are the author's alone and do not represent the views of the Company.
- Information published on your personal social media should comply with the Company's confidentiality and disclosure of proprietary data policies with respect to trade secrets and other business-related information.

- Refrain from using social media during work time or on equipment we provide. Do not use Company email addresses to register on social networks, blogs or other online tools utilized for personal use. Make sure you are always honest and accurate when posting information or news, and if you make a mistake, correct it quickly. Never post any information or rumors that you know to be false about the Company, fellow associates, members, customers, suppliers, people working on behalf of the Company or competitors.
- Do not post statements, photographs, video or audio that reasonably could be viewed as malicious, obscene, threatening or intimidating, that disparage customers, members, associates or suppliers, or that might constitute harassment or bullying. Examples of such conduct might include offensive posts meant to intentionally harm someone's reputation or posts that could contribute to a hostile work environment on the basis of race, sex, disability, religion or any other status protected by law or Company policy.
- The unlawful use of the Company's name, trademarks, or other intellectual property is prohibited." Social media activities should not interfere with work commitments.
- Do not reference or cite Company clients, partners, or customers without their express consent. In all cases, do not publish any information regarding a client during the engagement.
- Company logos and trademarks may not be used without written consent.

Nothing in this Code or any corresponding policy in the Employee Handbook is designed to limit an employee's rights under Section 7 of the National Labor Relations Act.

RECORDS INTEGRITY

Corporate Recordkeeping and Records Management

Company records must be true, accurate, and complete. Records could include accounting records, expense statements, financial and research reports, and time records. Improper or fraudulent accounting, documentation, or financial reporting violate Company policy and may also violate applicable laws, including anti-bribery statutes. All corporate records must be true, accurate and complete, and Company data must be promptly and accurately entered in our books in accordance with the law, Kensing's policies, and other applicable accounting principles.

We create, retain, and dispose of our Company records (in both physical or electronic form) as part of our normal course of business in compliance with all Company policies and guidelines, as well as all regulatory and legal requirements.

Fraud

Keeping accurate records also helps us prevent and detect fraud. Fraud generally involves taking something you are not entitled to or lying to receive something of benefit for yourself. It is prohibited, both within our Company and in all external dealings.

Fraud specifically includes:

- Theft of Company property
- Forgery
- Misappropriation of funds, securities, supplies, or any other Company asset
- Irregularities involving money transactions
- Falsification of expense statements, time records or any other Company record
- Improper financial reporting or recording fictitious or misleading transactions in financial records
- Bribery
- Tax evasion

Fraud may also include any accounting irregularity involving vendors, customers, Company personnel, agencies, unknown parties, or Company property.

No Improper Influence on Audits

We each have an obligation to cooperate with any internal audits or external audits conducted by our Company's external audit firm or at the direction of the Company. In these situations, always tell the truth and comply with any requests for information. We must not improperly influence, manipulate, or mislead any unauthorized audit, nor directly or indirectly interfere with any auditor engaged to perform an internal independent audit of Kensing's books, records, processes or internal controls.

We are often also subject to audit requests from customers or other parties. Contact your management or the Legal Department if you have questions regarding the Company's audit obligations.

Accurate Public Disclosures

We will make certain that all disclosures made in financial reports and public documents are full, accurate, and timely. This obligation applies to all employees, including all financial executives, with any responsibility for the preparation for such reports, including drafting, reviewing, and signing or certifying the information contained therein. No business goal of any kind is ever an excuse for misrepresenting facts or falsifying records.

Employees should inform a member of the Kensing Executive team and the HR department if they learn that information in any filing or public communication was untrue or misleading at the time it was made or if subsequent information would affect a similar future filing or public communication.

PARTNERSHIPS

Payments for Products and Services

We are committed to sound business practices in all our relationships with customers, suppliers, and other business associates. In all situations, we must exercise good judgment to avoid the appearance of inappropriate conduct. Sales-related commissions, rebates, discounts, credits, and allowances are customary business payments. However, we must be sure to avoid illegal or unethical payments and must comply with applicable currency exchange controls and regulations.

Payments that our Company makes or receives should be:

- Reasonable in value, relative to the goods or services provided and to industry norms.
- Properly documented in agreements reviewed and approved by the Legal Department. The documentation should clearly define the nature and purpose of the transaction.
- Payable to the appropriate business entity, not its individual officers, employees, or agents, and not payable to another business entity. The payment terms, payment method, and process for sending the payment should be defined in the agreement.
- Charged to the business entity or product benefiting from the payment. The company should provide full visibility regarding any payments and should not charge the payment to an unrelated account.

Anti-Corruption

Kensing sells and purchases products and services on the merits of competitive pricing, quality of work and materials, and timely performance. This means we never give, offer, or accept improper payments in any form. Many countries in which we do business have laws that strictly prohibit giving, receiving, offering, or soliciting bribes, kickbacks, and other improper payments. The Company is committed to complying with the U.S. Foreign Corrupt Practices Act (the “FCPA”) and other applicable anti-corruption laws.

The FCPA in particular prohibits the Company and its employees, directors, officers, and agents from offering, giving, or promising, or authorizing the payment or exchange of money or any other item of value, directly or indirectly, to win or retain business or to influence any act or decision of any government entity or official, political party, candidate for political office, or official of a public international organization (collectively, “Foreign Officials”). Items of value, include, but are not limited to, cash payments, non-cash gifts, travel meals, entertainment or gifts, promises to use certain vendors or intermediaries, and charitable donations.

The Company prohibits employees, directors, and officers from giving, or receiving or soliciting bribes, kickbacks, or other inducements to any Foreign Officials. This prohibition also extends to payments to agents acting on the Company's behalf if there is reason to believe that the payment will or may be used indirectly for a prohibited payment to any Foreign Officials. Indirect payments include any transfer of money or other item of value to another individual or organization where the person making the transfer knows or has reason to know that some or all of that transfer is for the benefit of an individual to whom direct payments are prohibited.

The use of agents or any other third-party for the payment of bribes, kickbacks or other inducements is expressly prohibited. Violation of the FCPA and other applicable anti-corruption laws is a crime that can result in severe fines and criminal penalties, as well as disciplinary action by the Company, up to and including, termination.

- A **bribe** is anything of value or an improper favor given or offered in an attempt to influence an individual's actions or decisions. These actions or decisions could take the form of helping Kensing obtain or retain business or acquire any sort of improper advantage. For example, the advantage might be providing information that is normally unavailable or allowing Kensing to submit a late bid or proposal.
- A **kickback** is a commonly used form of negotiated bribery by which the bribe-giver pays a commission to the bribe-receiver as a quid pro quo for services rendered. This often happens through fraudulent or inflated invoices, so that the bribe-giver in return receives a piece of the paid amount.

Facilitating or Expediting Payments

When working with government officials, we must never agree to pay facilitating payments, even if we are working in areas where it may be a common practice to do so. Facilitating or expediting payments, which are generally small payments made directly to a government official to secure timely performance of routine governmental actions that the Company is entitled to under local law, are not permitted. Such actions include obtaining permits and licenses, processing visas and work permits, mail pickup and delivery, and providing telephone and water service and supply. Payments made directly to a government agency according to a publicly available schedule of fees are allowed. Any such payments must be recorded as a business expense in the Company's books and records.

Any questions about the legality of any contemplated gift or payment to an official or elected representative should be directed to our legal team.

BUSINESS INTEGRITY

Fair Dealing

We endeavor to deal fairly with our customers, suppliers, competitors, and each other. We never take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair practice. Kensing does not promote its business by disparaging its competitors, their products, or their services.

Truthfully Market, Promote, and Advertise Our Products

We market, promote, and advertise our products in a fair, truthful, and ethical manner. We will never misstate the facts or mislead customers in our advertisements, labeling, packaging, or promotions.

Competition Law / Antitrust Law

Kensing is dedicated to ethical, fair, and vigorous competition. We will sell our products and services based on their merit, superior quality, functionality, and competitive pricing. We will make independent pricing and marketing decisions and will not improperly cooperate or coordinate our activities with our competitors. It is also critical that we avoid any activity that could violate or give the appearance of violating competition laws.

Competition and antitrust laws:

- Prohibit agreements or understandings between competitors that undermine competition.
- Regulate the behavior of dominant companies; and
- Require prior review and in some instances clearance for mergers, acquisitions, and certain other transactions, in order to prevent transactions that would substantially reduce competition.

These laws are complex, and global in reach, and can operate differently in any particular situation. It is often essential that you involve legal counsel early in the process of developing new commercial initiatives given the many uncertainties that arise in the application of these laws.

Kensing does not restrain competition among its competitors with reference to price, the quality or distribution of products, or by acting in concert to restrict the competitive capabilities or opportunities of competitors, suppliers, or customers. In all contact with competitors, avoid any conduct that suggests an understanding or agreement exists with respect to prices, terms of sale, production for third parties, or allocation of customers, markets, or territories. To this end, avoid any discussion or communication with any representative of a competitor related to the following:

- Prices
- Pricing policies
- Bids
- Discounts, rebates, royalties, or promotions

- Credit or shipment terms, or other conditions of sale
- Choice of customers or allocating customers between competitors
- Dividing up a territory between competitors
- Products to be manufactured or sold production, quantities or quotas (that is, agreements between competitors as to the amount of products to be manufactured and/or sold by each or the addition of new capacity)
- Employee compensation practices

Regardless of the circumstances, employees should exercise great caution in all meetings with competitors as any meeting with a competitor may give rise to the appearance of impropriety. As a result, if you are required to meet with a competitor for any reason, you should obtain the prior approval of Company management. You should try to meet with competitors in a closely monitored, controlled environment for a limited period of time. You should create and circulate agendas in advance of any such meetings, and the contents of your meeting should be fully documented. Prior to any meeting, it is also best practice that you receive written confirmation that all attendees will abide by all applicable anti-trust laws. The following are practical suggestions:

- If a competitor invites you to discuss pricing or other prohibited subjects, end the discussion immediately and report it to our legal team or management.
- Do not exchange price lists, bids, terms, or conditions of sale with a competitor, except in connection with a bona fide sale to, or purchase from, that competitor.
- Do not ask someone to determine what competitors will do in response to a proposed price move if obtaining an answer would involve contacting a competitor. Do not do anything indirectly that would be a violation of law if done directly. “Signaling” price moves among competitors can be tantamount to an agreement on prices.
- Refrain from discussing pricing or other matters detailed above during any acquisition, divestiture, or joint venture negotiation or other legitimate contact with our competitors without approval from the Legal Department.

Reciprocal Dealing

Kensing’s decision to buy goods and services from a supplier must be made independently from the supplier’s decision to purchase products or services from our Company.

Benchmarking is a structured approach for exchanging and analyzing information. Before we exchange information with a competitor or benchmark ourselves against them—whether directly or through a third party or consultant—we must determine whether there are competition concerns. This is because such exchanges could include information about prices and terms of sales, credit practices, costs, production levels, future plans, and compensation, which could violate antitrust laws. Accordingly, any such benchmarking or information exchanges must be approved in advance by the Legal Department.

Trade and credit associations and industry groups typically involve meetings of competitors. These groups should arrange for legal counsel to be present at all meetings to ensure compliance with competition laws. Request written approval from the Legal Department before applying for membership in one of these organizations. Be aware of antitrust related topics and activities. Never talk with other members about your business's current or future prices or marketing efforts. When the conversation strays into commercially sensitive topics, make other members aware and pull the discussion back on track. If that does not help, leave the meeting, and make sure that your concerns have been clearly documented in the minutes.

International Trade Compliance

International Trade Control (ITC) laws affect the transmission (import or export) of goods, services, and technology from one country to another. These laws apply to many aspects of Kensing's operations — such as the export of our products across national borders, our engagement of third parties, and our receipt of goods or services. It is important that we carefully observe ITC laws in connection with these and other relevant activities. Kensing's policy is to comply with all applicable ITC laws, including the laws and regulations described in more detail below.

Follow the below guidelines to ensure that the Company remains in compliance with ITC laws:

- Follow relevant ITC regulations of all countries in which you operate and Kensing's procedures as they relate to importing and exporting goods, technology, software, services, and conduct of financial transactions.
- Always know what you're exporting, its destination, the end user, and the end use.
- Always know the export classification of the item (*i.e.*, the product, software, or technology) you are exporting before conducting the export, which is necessary to determine if prior licensing is required for the export.
- Screen business partners, suppliers and parties involved in any international transactions to ensure actions do not violate trade or sanctions requirements.

For questions regarding how to comply with applicable law, this Code or Company policy contained in the Employee Handbook in connection with any potential import, export or third party dealing, contact a member of the Kensing Executive team.

Sanctions and Embargoes

As a global company headquartered in the United States with sales outside the United States, we are subject to U.S. and other global laws relating to sanctions and embargoes, including economic and trade sanctions administered and enforced by the U.S. Department of the Treasury’s Office of Foreign Assets Control (“OFAC”). These laws restrict transactions and dealings with persons or entities determined to be engaged in behavior contrary to U.S. national interests, such as criminal activities, terrorism, narcotics trafficking, and the proliferation of weapons of mass destruction. Such persons are identified on one of several lists of sanctioned persons maintained by OFAC, including the Specially Designated Nationals and Blocked Persons List (“SDN List”). The Company conducts pre-engagement screening to identify potential counterparties that are the target of OFAC sanctions, such as parties on the SDN List.

Further, OFAC sanctions broadly restrict transactions and dealings with certain countries and territories – currently **Cuba, Iran, North Korea, Syria, and the Crimea region of Ukraine**. Generally, these sanctions not only restrict dealings with individuals and companies located, operating, or organized in these areas, but also restrict transactions with the governments of these areas, and entities or individuals worldwide that are owned or controlled by, or acting for on behalf of, their governments. Similarly, although **Venezuela** is not subject to territory-wise sanctions, the Government of Venezuela is the target of U.S. sanctions, and OFAC sanctions restrict U.S. persons from dealing with the Government of Venezuela or with entities or individuals worldwide that are owned or controlled by, or acting for on behalf of, this government.

Any proposed dealing with a country, government, or person that is the target of sanctions must be reviewed by a member of the Kensing Executive team, who will (with the assistance of outside counsel, where warranted) determine whether the proposed conduct is consistent with applicable law. This also applies to deals made indirectly through third party business partners. As a general principle, if the Company cannot participate in a transaction directly, we also cannot participate in that activity indirectly (for example, through a distributor, reseller, or other third party).

Export Controls

Because we sell products across national borders, we must comply with applicable “export controls” that regulate the export, re-export, and transfer of items. For instance, because we export items from the United States, we must comply with export controls administered by the U.S. Department of Commerce’s Bureau of Industry and Security (“BIS”). BIS regulates the export, re-export, and transfer of items manufactured in the United States, items sourced from the United States, or items manufactured abroad with more than a small amount of U.S.-origin content. Further, BIS maintains lists of restricted persons, including the Denied Persons List and the Entity List.

The Company conducts screening to identify potential counterparties on one of these lists, and the Company will not engage in a transaction or dealing with or involving a party that appears on such a list unless the transaction has first been reviewed by a member of the Kensing Executive team, and the Company has confirmed that the proposed transaction is consistent with applicable law.

Money Laundering

People involved in criminal activity – e.g., terrorism, narcotics, bribery, and fraud – may try to “launder” the proceeds of their crimes to hide them or make them appear legitimate. Kensing will comply with all laws regarding the prohibition of money laundering. Kensing will conduct business only with reputable customers involved in legitimate business activities, with funds derived from legitimate sources. Prior review and approval from our treasurer is required for any questionable financial transactions involving transfers of cash or cash equivalents. Failing to detect customer relationships and transactions that place our Company at risk can severely damage our integrity and reputation.

What to watch out for:

- A customer, agent, or proposed business partner who is reluctant to provide complete information, provides insufficient, false, or suspicious information, or is anxious to avoid reporting or record keeping requirements.
- Payments using monetary instruments that appear to have no identifiable link to the customer or have been identified as money laundering mechanisms.
- Attempts by a customer or proposed business partner to pay in cash.
- Early repayment of a loan in cash or cash equivalents.
- Orders, purchases or payments that are unusual or inconsistent with the customer’s trade or business.
- Unusually complex deal structures, payment patterns that reflect no real business purpose, or unusually favorable payment terms.
- Unusual fund transfers to or from countries unrelated to the transaction or not logical for the customer.
- Transactions involving locations identified as secrecy havens or areas of known terrorist activity, narcotics trafficking or money laundering activity.
- Transactions involving foreign shell or offshore banks, unlicensed money remitters or currency exchangers, or nonbank financial intermediaries.
- Structuring of transactions to evade recordkeeping or reporting requirements (for example, multiple transactions below the reportable threshold amounts).
- Requests to transfer money or return deposits to a third party or unknown or unrecognized account.

Antiboycott Laws and Regulations

As a U.S.-based company, we are subject to so-called “antiboycott” laws and regulations, which prohibit participation in boycotts not recognized by the United States. These laws can require us to report to the U.S. government certain information about boycott-related requests.

The primary target of U.S. antiboycott laws is the Arab League Boycott of Israel. U.S. companies are not permitted to agree to participate in this boycott.

Kensing will not participate in or support economic boycotts that are prohibited under applicable law. As a global company, we must take care that nothing we do or say could be seen as participating in an illegal boycott. For example, inquiries regarding whether the Company does business with Israel or with companies that do business with Israel are considered invitations to participate in the Arab League Boycott of Israel. Employees must not furnish information or answer questions in response to such invitations. Boycott-related requests are often received orally or in the form of a contract bid, purchase order, insurance verification, letter of credit, shipping document, or joint venture or alliance negotiations. Any request to participate in or support a boycott not recognized by the United States must be reported to a member of the Kensing Executive team, who will determine the appropriate course of action (including reporting to the U.S. Government, as needed).

Individual and Corporate Political Activities

Kensing does not restrict employees from participating in political affairs in their personal capacities, including holding elected office. However, these activities should be limited to your own time and resources. Employees may not use Company resources such as equipment, e-mail, phones, computers, and copiers in support of their political activities. Employees will not be reimbursed for any financial contribution or in-kind support, without specific, prior approval from Kensing’s legal team. Employees who appear in campaign or political advertising must make it clear that they are appearing in their personal capacities and not as a spokesperson for the Company. This can prevent any conflict of interest and ensures that we comply with all applicable laws. If you wish to seek public office, be aware of applicable policies and discuss the matter with Kensing’s legal team and your management.

Charitable Giving and Donations

Kensing fully supports charitable giving to approved organizations as a way to support our communities and Company philanthropic objectives. However, when the charitable organization has links to a foreign government, for instance through ownership, specific care must be taken to ensure against allegations of bribery or corruption. For that reason, all donations made by Kensing, including donations made in and outside of the United States, always require prior approval from legal counsel. Kensing donations must be properly recorded. Of course, employees can make personal donations to charitable organizations, but not on behalf of the Company.

Additionally, all Kensing donations need to be approved by the Kensing Executive team.

Government Contracting

There are complex regulations that apply to government contracts. These regulations have restrictions that can be significantly different from those that apply to our contracts with private commercial entities. Government procurement regulations cover pricing, cost accounting, quality control and testing, paying gratuities and kickbacks to government employees, hiring, or retaining former government employees, and the confidentiality of government information. Seek advice from the Legal Department when evaluating government contracting.

Environment, Health and Safety

As a leading supplier of high-natural-index ingredients, we strive to have a positive impact on our environment, climate, and the societies we touch, everywhere in the world.

As we close the first quarter of our century, the challenges of mankind's footprint on our planet have become ubiquitous. A new generation of consumers, investors and decision makers are taking the reins of global markets and governments. Rightfully, they are demanding higher standards in protecting our planet, its people and all other living organisms that constitute our global ecosystem. We believe that material and ingredient companies such as Kensing have both an obligation, and a huge opportunity, to drive change in how goods are produced and consumed, in an effort to transform current practices into a fully sustainable way of living.

Our culture of EH&S is not an afterthought at Kensing. It is not a practice or a process, nor a goal in itself. It is simply a core value which guides all decisions.

We strongly believe that sustainable economic success cannot be achieved at scale without a positive environmental and societal impact. We will not compromise our sustainability goals, and Employee, Health and Safety is central to this equation.

This tenet will drive all our decisions, from how we assess market opportunities to how we produce and finance our growth. Sustainable development & EH&S will become the core driver for Kensing's success, from developing high-natural index products, to supporting our customers in their carbon footprint reduction journey, from building the most diverse teams, to insuring we have a positive impact on the societies in which we operate and the communities from which we source our raw materials.

Every employee in Kensing is responsible to make sure these standards and values are upheld to build one of the most sustainable companies in our industry. Through management leadership and employee commitment, Kensing has built a world-class EH&S culture and will strive to continuously improve our position. We are integrating our EHS processes into our core ESG programs, with the aim of making Kensing a world-class steward of well-being for our employees, all our stakeholders and business partners, and global environment.

Providing a Safe and Healthy Workplace

Each of us needs to have a working knowledge of the environmental, health and safety laws, regulations, and Company policies that apply to our area of responsibility. We should also be aware of the resources that are available in the Company to help us comply with these rules.

Kensing will provide and use safety devices, safeguards and use work practices, methods, processes meant to control hazards and avoid risks, to make your workplace safe.

We expect employees to follow these basic guidelines:

- Study and follow all safe practices that apply to their work.
- Coordinate and cooperate with all other employees in the workplace to try to eliminate on-the-job injuries and illnesses.
- Apply the principles of accident prevention in their daily work and use proper safety devices and protective equipment as required.
- Use and take care of all Personal Protective Equipment (PPE).
- Take time and use diligence to do their job safely.
- Report all job-related injuries or illnesses.
- Identify and eliminate hazards that may exist in the workplace.

Wellness of Team

We encourage employees to make personal choices to promote a healthy lifestyle that includes appropriate work-life balance.

Impairing Substances

At Kensing, we must be free of impairment due to alcohol or drugs upon reporting to work and during all work time. To that end, we may not use or possess illegal drugs on Company property or while on Company business. This prohibition includes prescribed or over-the-counter drugs that are not being used as prescribed or intended.

Alcohol: Unauthorized possession or use of alcohol on Company property is prohibited. Use of alcohol off premises while on Company business is also prohibited if it results in:

- Impairment of the team member's business judgment or job performance
- Placing anyone's safety at risk.

Drugs: The possession, use, sale, manufacture, or distribution of illegal drugs, and the abuse, misuse, or sale of prescription drugs, is also not allowed.

Driving under the influence

While driving a Company vehicle and/or while on Company business, in addition to following all traffic rules, we must never drive under the influence of alcohol or illegal or prescription drugs. Countries may have varying levels of legal impairment thresholds that you should be aware of.

If you are cited for an alcohol-related traffic violation while driving a Company-owned or leased vehicle (including rental cars), you must report the incident to management. If you regularly use a company-leased vehicle for your job (sales, for example), you must report any alcohol-related traffic citations, even if you were driving a different vehicle at the time.

Respect in the Workplace

Kensing is committed to a work environment where employees feel valued, supported, and empowered. In such an environment, individuals are treated with respect, people's ideas and contributions are valued, and the workplace is free from harassment and discrimination.

Kensing relies on the contributions of a diverse workforce. We recognize that people who bring different perspectives or have different backgrounds than other employees can bring valuable insights that positively affect our business and work culture.

Kensing is committed to equal opportunity in all aspects of the employment relationship. Kensing prohibits any form of harassment, as defined by this Code of Conduct, Company policy, and applicable law, based on any of the protected characteristics. This may include harassing behavior by employees, supervisors, managers, suppliers, visitors, or customers.

As employees of Kensing, we strive for excellence in all aspects of our business. Our success as a company and as individuals depends on the contributions of all the people we work with.

We have a responsibility to treat each other with respect.

Workplace Violence

Kensing will not tolerate violence in the workplace in any form. Examples of workplace violence include physical assault, threat of physical harm or assault, stalking, and intimidation. If you know of or suspect incidents or threats of workplace violence, you must immediately report your concerns. If you believe someone is in immediate danger, contact plant protection or a member of corporate security.

Weapons

Firearms and other weapons are strictly prohibited on Company property (except for security personnel expressly authorized)-Company property includes but is not limited to Company-owned or controlled land—both developed and undeveloped—as well as Company buildings, parking lots, and vehicles. Temporary possession of a weapon on company property can be authorized by the Kensing Executive team for security personnel when it is necessary to ensure safety and security.

Protecting the Environment

We understand that contributing to a healthy environment is beneficial for the communities in which we operate and for business. To that end, we continually assess and improve our processes to protect the communities in which we live. To do this, we conduct periodic risk assessments to identify potential hazards and then take appropriate measures to minimize these risks. In these assessments, we consider not only scientific and economic factors, but also societal factors to ensure we perform a proper and balanced evaluation. We work to set a good example for the rest of our industry by striving to meet - or exceed - the environmental laws, regulations, and standards that apply to us. Each of us has a responsibility to report any practice that is harmful to the environment or does not comply with our Company's policies.

DOING THE RIGHT THING

Several key questions can help identify situations that may be unethical, inappropriate, or illegal.

Ask yourself:

- Does what I am doing comply with Kensing's guiding principles, Code of Conduct, and company policies?
- Have I been asked to misrepresent information or deviate from normal procedure?
- Would I feel comfortable describing my decision at a staff meeting?
- Am I willing to be held accountable for this decision?
- How would it look if it made the headlines?
- Am I being loyal to my family, my company and myself?
- What would I tell my child to do?
- Is this the right thing to do?

Remember:

- **Act** if you see an issue.
- **Ask** if you're not sure.

RESOURCES

- Kensing Employee Handbook