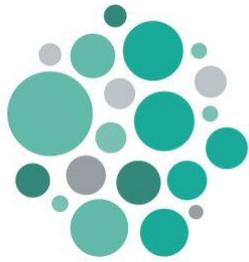




# CODE OF CONDUCT



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On behalf of the Board and Executive Management Team at Airandé I am proud to present the Airandé Code of Conduct.

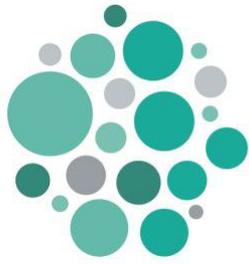
As a global leader in protecting consumers' health through the delivery of leading-edge disinfection technologies, Airandé is committed to honest, legal, and ethical practices and conducting business with integrity and trustworthiness. This is a company-wide objective that starts with each individual.

Each of us at Airandé is accountable for the decisions and actions that we take. And we expect that our suppliers, partners, and other stakeholders will also subscribe to the principles of our Code of Conduct.

This Code is an indispensable reference for each and every one of us, internally and across our network of relationships, to help make the right decisions, at the right time, in an increasingly complex professional environment.

*Bill Hovey*

Bill Hovey  
President & CEO  
January 2023



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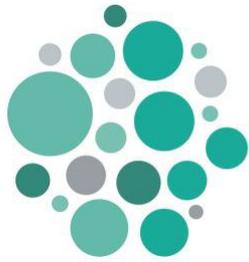
## PREAMBLE

Airandé Pty Limited, its subsidiaries and affiliates (the “Airandé”) are strongly committed to public health. The Company’s positive reputation is based on its three core values of Excellence in Science, Environmental Sustainability, and Making a Contribution to Humanity. These values allow us to continue to grow as a leader in our field.

Our leadership position in the protection and enhancement of consumers’ health, our expertise in disinfection, and our international presence give us an obligation to always act in compliance with the legal requirements and with the best integrity and ethical principles and to behave as a responsible corporate citizen.

The purpose of this Code is to define the compliance and ethics principles that apply to the Company and each officer, director, employee, agent, and contractor of the Company.

The Code will also govern our relationships with our customers, suppliers, business partners and more generally all stakeholders of Airandé.



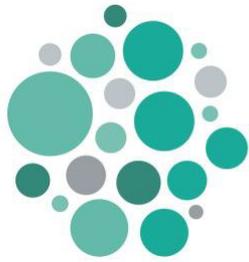
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## IMPLEMENTATION and CONTACTS

Airandé encourages a culture of openness where employees can feel comfortable raising concerns and questions about the Code and its implementation. This openness is essential for an effective Compliance Program.

If there are any concerns about behaviour that may violate the Code, you are encouraged and expected to escalate those concerns to your manager, supervisor, human resources or to the Corporate Compliance Officer. Airandé will promptly and thoroughly investigate any complaints and take appropriate action. You may also raise questions, report incidents or complaints by using our compliance channel [compliance@airande.global](mailto:compliance@airande.global). Any question or information reported will be treated carefully by the Corporate Compliance Officer.

The communications or complaints about compliance with the Code must always be made under the criteria of truth, clarity and completeness, and must not be used to achieve anything but the objectives defined in it.



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## DEFINITIONS

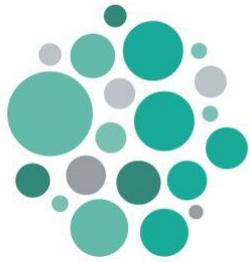
**Corruption** is the willingness to act dishonestly or fraudulently, directly or indirectly, in return for personal gain. A person in a position of power who is illegally paid to make a decision that favours the payer has participated in corruption - and so has the payer.

**Airandé** represents the holding company duly registered to which various Companies belong.

**Money Laundering** is the process of disguising the nature and source of money connected with criminal activities (such as corruption, terrorism, or drug trafficking) as legitimate commerce where the true source cannot be identified.

**Personal data** means any information relating to an individual by which they can be identified, directly or indirectly, in particular by reference to an identification number or to one or more factors specific to his physical, psychological, mental, economic, cultural or social identity.

**Subsidiaries** represent any legal entity which is a subsidiary held directly or indirectly by Airandé.



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## SUMMARY

QUALITY OF PRODUCTS AND SERVICES

DEALING WITH BUSINESS PARTNERS

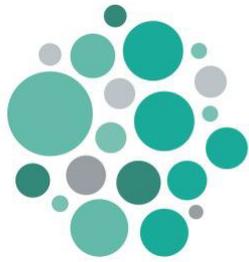
RESPECT OF COMPANY'S ASSETS

COMMUNICATION AND CONFIDENTIALITY

BUSINESS RECORDS

COMMITMENTS TO EMPLOYEES

CORPORATE SOCIAL RESPONSIBILITY



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## QUALITY OF PRODUCTS AND SERVICES

### QUALITY MANAGEMENT

We understand that the quality of our products and services is critical for our clients and for consumer safety. Airandé has therefore created quality management systems and policies and is committed to providing reliable and quality products and services through optimal performance while complying with international regulations.

Airandé' quality management system has been certified by BSI under ISO 13485 and EN ISO 1385.

### INDEPENDENCE

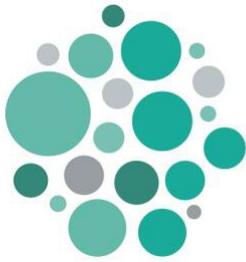
At Airandé decisions are based on scientific results, analysis, and engineering and manufacturing merits and not on personal interests or relationships that could result in unfair or impartial business decisions.

To ensure and maintain the high degree of quality and trust with our customers, Airandé is committed to providing services independently and without undue interference from customers or third parties.

### ABSENCE OF CONFLICTS OF INTERESTS

Conflicts of interest and circumstances that reasonably present the appearance of a conflict should be avoided. As a general rule, we must act in the customers' best interests at all time, by applying good judgment and not allowing private interests to interfere with consumers' safety.

Receiving gifts of more than a nominal value presents a potential conflict of interest for employees. Further, you should not accept or remain in any situation in which personal investments, outside employment or advisory roles, business opportunities, or a relationship with friends or relatives could impact your ability to make objective judgments. Conflicts must be disclosed and dealt with openly and transparently.



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## DEALING WITH BUSINESS PARTNERS

### RELIABLE FINANCIAL STATEMENTS

Airandé is committed to always maintaining accurate and honest financial records. We must ensure that our business operations are properly recorded in accordance with applicable accounting standards and with our internal financial policies and procedures.

### PREVENTION OF MONEY LAUNDERING

Airandé is committed to complying with all laws against money laundering that prohibit businesses from accepting or processing proceeds of criminal activities. The Company expressly prohibits the participation in any activity or transaction conceived to disguise the nature and source of money connected with criminal activities (such as corruption, terrorism, or drug trafficking) as legitimate commerce where the true source of the funds cannot be identified.

### PREVENTION OF CORRUPTION

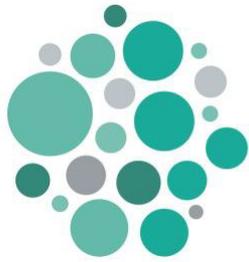
Airandé is committed to conducting its activities free from the unfair influence of any bribery and corruption and in accordance with the United States Foreign Corrupt Practices Act and other anti-corruption laws that apply wherever the Company does business.

Neither Airandé nor its people shall offer or make a corrupt payment to any government official or entity, political party or candidate, or employee or enterprise owned or controlled by a government agency, for the purpose of influencing any official action or inaction, or obtaining, retaining, or directing business. Nor shall Airandé or its people engage in any form of bribery or fraud, including but not limited to embezzlement, theft, hiding, or misusing Airandé's assets, or falsification of records and reports.

### RESPECT OF FAIR COMPETITION

Airandé promotes free competition as the best way to achieve progress in the interest of the customers and the public health. Fairness in our relationships with our competitors promotes trust from customers. Consistent with the antitrust and competition laws in the countries in which the Company operates, Airandé is committed to competing fairly and in the spirit of promoting free competition.

We endeavour to partner with diverse businesses, giving them the opportunity to present their



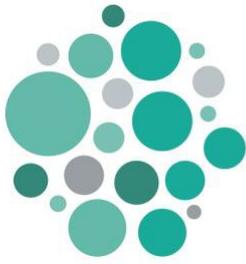
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products, services, and expertise to Airandé. This includes small businesses and those owned by women, minorities, veterans and disabled persons.

Suppliers are selected based on price, quality, delivery, services, diversity and reputation, as well as their commitment to responsible environmental and ethical business practices.

### RESPECT OF INTERNATIONAL TRADE RELATIONS

Airandé has customers and business partners all over the world. International trade laws control where we can send or receive products and services. Compliance with import, export, boycotts, customs, and embargo regulations is a priority to develop a sustainable international business. Commodities (goods and materials), technology (technical data and know-how), and software are all covered by these regulations.



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## RESPECT OF COMPANY'S ASSETS

### PROTECTING THE COMPANY'S INTELLECTUAL PROPERTY RIGHTS

Airandé's intellectual property rights (our trademarks, logos, copyrights, trade secrets, "know-how", and patents) are among our most valuable assets. Unauthorized use can lead to their loss or serious loss of value.

Our employees, contractors, partners, and suppliers must respect all of Airandé's intellectual property rights and never use the Company's logos, marks, or other protected information or property for any business or commercial venture without prior written authorization.

Likewise, respect the intellectual property rights of others. Inappropriate use of others' intellectual property may expose Airandé and its employees, contractors, partners, and suppliers to criminal and civil penalties.

### PRESERVING CONFIDENTIALITY

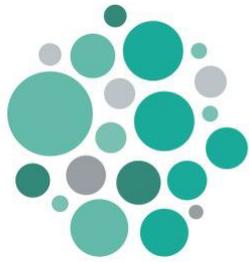
Airandé dedicates significant human and financial resources to create innovative processes and ideas in the technical, scientific, financial, and business fields. All such information represents valuable assets that must be protected with the utmost care.

Confidentiality of Airandé's trade secrets and confidential information must be maintained. Trade secrets may include information regarding the development of systems, processes, services, products, productivity models, performance metrics, financial plans, strategic and financial plans, know-how, and technology, drawings, designs, and other confidential information regarding customers and operations.

If it is necessary to disclose confidential information to outside parties, the appropriate parties must sign a Non-Disclosure Agreement (NDA) before any information is shared. NDA's do not relieve us of the responsibility to use care in deciding what information to disclose. The absence of documentation of exchanges of information or any breaches of NDA provisions may expose Airandé to the loss of the protection of its information or to damage its claims against that loss.

### USE OF THE COMPANY'S ASSETS

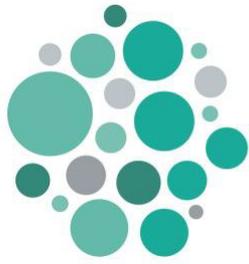
Airandé's products and services are used only for Airandé's legitimate business purposes, and not for any personal benefit and never for any illegal or unethical purposes.



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Airandé, through its people, must always strive to protect and preserve Airandé's assets against theft, loss, damage, carelessness, waste, and misuse.

The personal use of Airandé's information technology resources (email, internet, phones, etc.) should not interfere with work productivity and should not exceed a nominal cost to Airandé.



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## COMMUNICATION AND CONFIDENTIALITY

### COMMUNICATION

Airandé's reputation depends on it providing accurate and consistent information to the public, including existing and potential customers, as well as to the press. We are all responsible for maintaining this reputation, and so it is imperative that only those authorized to speak on behalf of Airandé are those that do so.

### PROTECTION OF CONFIDENTIAL INFORMATION

It is imperative to adopt necessary measures to protect the confidentiality of information provided by our clients, suppliers and business partners.

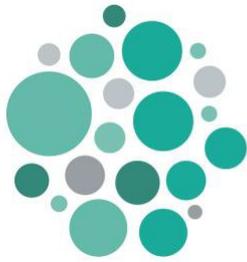
To this end, our people are strictly prohibited from appropriating or taking advantage of any confidential information learned from a third party through the course of the business relationship, or from infringing on or plagiarizing any intellectual property rights (including patents, copyrights, trademarks, or trade secrets) of a third party.

### PROTECTION OF PRIVACY RIGHTS

Airandé recognizes the importance of privacy as a fundamental right. Maintaining privacy of personal information of employees, former employees, job applicants, study participants, and others is paramount to us. We are committed to putting systems in place to promote compliance with privacy laws applicable to our business in order to ensure that personal information is collected, processed, stored, and transferred using adequate precautions and access is limited only to individuals having a legitimate reason to know and/or access such information.

Accordingly, Airandé will ensure that its whole-of-company approach is one that respects the privacy rights of employees as well as clients, vendors, and others with whom it works.

Anyone at Airandé with access to personal information must agree to adhere to the applicable personal data protection rules and collect, use, and disclose personal information only in accordance with local regulations and laws.



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## BUSINESS RECORDS

### PUTTING IT IN WRITING

Airandé's commitment to integrity is bolstered by the proper creation, maintenance, and disposal of accurate business records. These records are valuable assets and should be carefully managed and protected. Proper recordkeeping is an essential part of compliance.

### RECORD RETENTION AND DESTRUCTION

The laws in the countries we do business require Airandé to maintain certain records for specified periods of time. Failing to comply with global and local rules could result in financial penalties, sanctions or serious disadvantages in any future legal proceedings. In addition, everyone has to remember that Airandé's records are its responsibility. Airandé must be able to defend any documents that its employees created.

Employees are expected to follow Airandé's record retention and destruction policies as well as related applicable laws in the countries where Airandé does business.

It is our policy not to destroy or alter our records or documents in response to or in anticipation of any legal proceeding or government inquiry or investigation. You are not allowed to alter, destroy, or conceal a record with the intent to impair its availability for use in an official proceeding.

### CONTRACTS AND OTHER LEGAL DOCUMENTS

Valid and enforceable legal documentation strongly support Airandé's achieving its business objectives and protects it from serious business, legal, and ethical risks.

Without proper legal documentation, it can be difficult to enforce a business arrangement if there is a dispute or litigation. It can also be difficult or even impossible to recognize revenue in accordance with accounting rules, or to hold another party accountable to Airandé.

Carefully documenting services provided to the Company by intermediaries such as consultants, advisors, agents, specialists, or distributors is a must. Payments to such parties should be carefully set to correspond fairly to the services provided and must be properly entered in the Company's books.



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## COMMITMENTS TO EMPLOYEES

As a public health player with a global presence, we place people at the heart of our activities. Airandé respects the Fundamental Conventions of the U.N.

### HEALTHY AND SAFE WORK ENVIRONMENT

The safety of employees is a top priority. All employees of Airandé have a right to a healthy and safe working environment.

Each employee is responsible for taking reasonable precautions to prevent harm to themselves and to other people by maintaining a secure work environment, including being compliant with relevant or local health, safety, and environmental requirements.

Any act or threat of violence in the workplace by or against an employee is forbidden.

Airandé prohibits employees from making threats or engaging in violent acts against fellow employees or any individual conducting business with it.

### DIVERSITY

We are committed to fostering an inclusive environment of equal employment and advancement opportunity for all qualified individuals, where employees can reach their full potential.

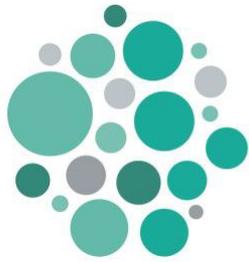
The diversity of our employees is a strength that is promoted and supported throughout the Company. Our commitment to diversity includes making reasonable accommodations to assist those with disabilities and social needs.

Airandé prohibits behaviour that singles out an employee or group of employees in a negative way because of their gender, age, race, ethnicity, national origin, religion, marital status, sexual orientation or identification, disability, illness, genetic information or any other characteristics protected under applicable laws.

All aspects of the employment relationship, such as hiring, assignment, promotion, compensation, discipline and termination must be made without regard to these characteristics.

### PREVENTION OF HARASSMENT, DISCRIMINATION, AND BULLYING

Airandé supports and promotes a work environment that is free of harassment,



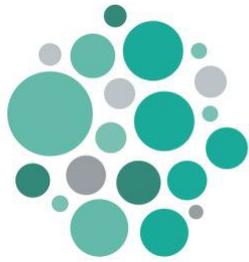
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discrimination, and bullying in any form. Airandé will not tolerate offensive or abusive behaviour in the workplace, including unwelcome sexual advances, requests for sexual favours, and other verbal or physical conduct that is harassing or discriminatory.

#### DRUGS AND ALCOHOL

Airandé is committed to maintaining a healthy and drug free work environment. Possession or use of a substance (other than prescribed medication) that could create a hazardous condition is strictly prohibited in the workplace.

Illegal drugs on our premises or at sponsored events are strictly prohibited. Consumption of alcohol is always subject to prior approval. Use good judgment and never drink in a way that leads to impaired performance or inappropriate behaviour, endangers the safety of others, or violates the law.



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## CORPORATE SOCIAL RESPONSIBILITY

### HUMAN RIGHTS

Airandé promotes and upholds international law on human rights. Airandé condemns the use of forced labour and exploitative child labour. We comply with all laws regarding modern slavery and human trafficking and expect our clients, vendors and business partners to do the same.

### PROTECTING THE ENVIRONMENT

Airandé is dedicated to ensuring the sustainable development of its activities in compliance with environmental laws and regulations, with the view to minimize our environmental impact.

Internal operational systems are in place and must be continuously followed and improved upon to identify, label, and manage chemicals and hazardous materials that present a danger to the environment to ensure their safe handling, movement, storage, recycling or reuse and disposal.

### SUPPORTING PHILANTHROPY

Airandé's philanthropic activity in the public health space is at our core. We give focus to our charitable giving by supporting the actions of organisations that complement our three core principles: Excellence in Science, Environmental Sustainability, and Making a Contribution to Humanity.

Airandé will offer support to specific initiatives and projects in our fields of expertise in the countries in which we operate. We prioritize initiatives that respond to requests from organizations with recognized public interest status.

These donations are given voluntarily, as reflections of our values, without any expectation of favourable treatment by the recipient in return. Airandé never makes a contribution in exchange for a business favour or business advantage.