



BLUBOX CODE OF CONDUCT

Rev 2 – 18-05-23

The BluBOX Code of Conduct is one of the ways BluBOX's values are put into practice. It's built around the recognition that everything we do in connection with our work at BluBOX will be, and should be, measured against the highest possible standards of ethical business conduct. We set the bar that high for practical as well as aspirational reasons: Our commitment to the highest standards helps us hire great people, build great products, and attract loyal users. Respect for our users, for the opportunity, and for each other are foundational to our success, and are something we need to support every day.

So please do read the Code and BluBOX's values, and follow both in spirit and letter, always bearing in mind that each of us has a personal responsibility to incorporate, and to encourage other BOXERS to incorporate, the principles of the Code and values into our work. And if you have a question or ever think that one of your fellow BOXERS or the company as-a-whole is falling short, don't be silent. We want - and need - to hear from you.

Who Must Follow the Code?

All employees and Board members are expected to know and follow the Code. Failure to do so can result in disciplinary action, including termination of employment. Moreover, while the Code is specifically-written for BluBOX employees and Board members, BluBOX contractors, consultants, and others who may be temporarily assigned to perform work or services for BluBOX are expected to follow the Code in connection with their work for BluBOX. Failure of a BluBOX contractor, consultant, or other covered service provider to follow the Code can result in termination of their relationship with BluBOX.

What If I Have a Code-Related Question or Concern?

If you have a question or concern, don't just sit there. You can contact your manager, or a sr. manager of the company. You can also submit a question or raise a concern of a suspected violation of the Code, of any other BluBOX policy, or of the law, by e-mailing the CEO or the COO.

No Retaliation

BluBOX prohibits retaliation against any worker who reports or participates in an investigation of a possible violation of the Code, policies or the law. If you believe you are being retaliated against, please contact the COO or the CEO.

1. Serving BluBOX's Users

Users value BluBOX not only because it delivers great products and services, but because it holds itself to a higher standard in how it treats users and operates in general. Keeping the following principles in mind will help maintain that high standard:



1.1. Integrity

BluBOX's reputation as a company is its most valuable asset, and it is up to all BOXERS to make sure that we continually earn the trust of BluBOX's clients and users. All communications and other interactions with clients and users should increase their trust in BluBOX.

1.2. Usefulness

BluBOX's products, features and services should make BluBOX more useful to its users. BluBOX has many different types of users, in particular resellers and end-users, but one guiding principle: "Is what is being offered useful?"

1.3. Privacy, Security and Freedom of Expression

Always remember that we are asking users to trust us with personal information. Preserving that trust requires that each of us respect and protect the privacy and security of that information. BluBOX's Information Security Plan strictly limits access to and use of users' personal information and requires that each BOXER take measure to protect users' data from unauthorized access. Know your responsibilities under the Plan and collect, use and access user personal information only as authorized by the Security Plan, BluBOX's Privacy Policy, and applicable data protection laws.

Contact the COO or the CEO if you have questions on implementing these standards in connection with what you do at BluBOX.

1.4. Responsiveness

Part of being useful and honest is being responsive: We recognize relevant user feedback when we see it, and we do something about it. We take pride in responding to communications from our users, whether questions, problems, or compliments. If something is broken, we fix it.

1.5. Take Action

Any time you feel our users aren't being well-served, don't be bashful - let someone in the company know about it. Continually improving our products and services takes all of us, and we're proud that BOXERS champion our users and take the initiative to step forward when the interests of our users are at stake.

2. Supporting Each Other

BluBOX is committed to a supportive work environment, where contributors have the opportunity to reach their fullest potential. BOXERS are expected to do their utmost to create a workplace culture that is free of harassment, intimidation, bias, and unlawful discrimination.

2.1. Equal Opportunity Employment

Employment at BluBOX is based solely upon individual merit and qualifications directly related to professional competence. We strictly prohibit unlawful discrimination or harassment on the basis of



race, color, religion, veteran status, national origin, ancestry, pregnancy status, sex, gender identity or expression, age, marital status, mental or physical disability, medical condition, sexual orientation, or any other characteristics protected by law. We also make all reasonable accommodations to meet our obligations under laws protecting the rights of the disabled.

2.2. Harassment, Discrimination, and Bullying

BluBOX prohibits discrimination, harassment and bullying in any form - verbal, physical, or visual. If you believe you've been bullied or harassed by anyone at BluBOX, or by a BluBOX partner or vendor, we strongly encourage you to immediately report the incident to the COO or the CEO.

Similarly, supervisors and managers who learn of any such incident should immediately report it. Complaints will be promptly and thoroughly investigated and any appropriate action will be taken.

2.3. Drugs and Alcohol

Our position on substance abuse is simple: It is incompatible with the health and safety of our contributors, and we don't permit it. Consumption of alcohol is not banned, but use good judgment and never drink in a way that leads to impaired performance or inappropriate behavior, endangers the safety of others, or violates the law. Illegal drugs on BluBOX premises or at sponsored events are strictly prohibited. If a manager has reasonable suspicion to believe that a contributor's use of drugs and/or alcohol may adversely affect his/her performance or the safety of others in the workplace, the manager may request an alcohol and/or drug screening. A reasonable suspicion may be based on objective symptoms such as the employee's appearance, behavior, or speech.

2.4. Safe Workplace

We are committed to a violence-free work environment, and we will not tolerate any level of violence or the threat of violence in the workplace. Under no circumstances should anyone bring a weapon to a workplace or gathering. If you become aware of a violation of this policy, you should report it immediately.

3. Avoiding Conflicts of Interest

A situation in which competing loyalties could cause you to be seen as pursuing a personal benefit for you, your friends, or your family at the expense of BluBOX or its users, may face you with a conflict of interest. All BluBOX contributors must avoid conflicts of interest and circumstances that reasonably present the appearance of a conflict.

When considering a course of action, ask yourself whether the action you're considering could be seen to benefit you, your friends or family, or an associated business at the expense of BluBOX. If the answer is "yes," the action you're considering is a conflict of interest, and you should avoid it.

Below, we provide guidance in seven areas where conflicts of interest often arise:

- Personal investments

- Outside employment, advisory roles, board seats, and starting your own business
- Business opportunities found through work
- Inventions
- Friends and relatives; co-worker relationships
- Accepting gifts, entertainment, and other business courtesies
- Use of BluBOX products and services for other than work-related circumstances.

In each of these situations, the rule is the same - if you are considering entering into a business situation that may create a conflict of interest, don't. If you are in a business situation that may create a conflict of interest, or the appearance of a conflict of interest, review the situation with your manager or the CCO or CEO. Finally, it's important to understand that as circumstances change, a situation that previously didn't present a conflict of interest may present one.

3.1. Personal Investments

Avoid making personal investments in companies that are BluBOX competitors or business partners when the investment might cause, or appear to cause, you to act in a way that could harm BluBOX.

When determining whether a personal investment creates a conflict of interest, consider the relationship between the business of the outside company, BluBOX's business, and what you do at BluBOX, including whether the company has a business relationship with BluBOX that you can influence, and the extent to which the company competes with BluBOX. You should also consider 1) any overlap between your specific role at BluBOX and the company's business, 2) the significance of the investment, including the size of the investment in relation to your net worth, 3) whether the investment is in a public or private company, 4) your ownership percentage of the company, and 5) the extent to which the investment gives you the ability to manage and control the company.

Investments in venture capital or other similar funds that invest in a broad cross-section of companies that may include BluBOX competitors or business partners generally do not create conflicts of interest. However, a conflict of interest may exist if you control the fund's investment activity.

3.2. Outside Employment, Advisory Roles, Board Seats, and Starting Your Own Business

Avoid accepting employment, advisory positions, or board seats with BluBOX competitors or business partners when your judgment could be, or could appear to be, influenced in a way that could harm BluBOX. Additionally, because board seats come with fiduciary obligations that can make them particularly tricky from a conflict of interest perspective, you should notify your manager before accepting a board seat with any outside company. BluBOX board members or employees who are VP and above should also notify of their intent. Finally, do not start your own business if it will compete with BluBOX.

3.3. Business Opportunities Found Through Work

Business opportunities discovered through your work at BluBOX belong first to BluBOX, except as otherwise agreed to by BluBOX.

3.4. Inventions

Developing or helping to develop outside inventions that a) relate to BluBOX's existing or reasonably anticipated products and services, b) relate to your position at BluBOX, or c) are developed using BluBOX corporate resources may create conflicts of interest and be subject to the provisions of BluBOX's Confidential Information and Invention Assignment Agreement and other employment agreements. If you have any questions about potential conflicts or intellectual property ownership involving an outside invention or other intellectual property, consult with the COO or CEO.

3.5. Friends and Relatives; Co-Worker Relationships

Avoid participating in management of or decision-making regarding potential or existing BluBOX business relationships that involve your relatives, spouse or significant other, or close friends. This includes being the hiring manager for a position for which your relative or close friend is being considered or being a relationship manager for a company associated with your spouse or significant other.

To be clear, just because a relative, spouse/significant other, or close friend works at BluBOX or becomes a BluBOX competitor or business partner doesn't mean there is a conflict of interest. However, if you are also involved in that BluBOX business relationship, it can be very sensitive. The right thing to do in that situation is to discuss the relationship with your manager. Finally, romantic relationships between co-workers can, depending on the work roles and respective positions of the co-workers involved, create an actual or apparent conflict of interest. If a romantic relationship does create an actual or apparent conflict, it may require changes to work arrangements or even the termination of employment of either or both individuals involved.

3.6. Accepting Gifts, Entertainment, and Other Business Courtesies

Accepting gifts, entertainment, and other business courtesies from a BluBOX competitor or business partner can easily create the appearance of a conflict of interest, especially if the value of the item is significant. Please notify the COO or the CEO in the event a gift of this nature is being proposed to you for specific guidance on whether it is appropriate for you to accept the gift, entertainment, or other business courtesy (including discounts or benefits that are not made available to all BOXERS). Be aware that you may need to obtain your manager's approval before accepting any type of gift.

Generally, acceptance of inexpensive "token" non-cash gifts is permissible. In addition, infrequent

and moderate business meals and entertainment with clients and infrequent invitations to attend local sporting events and celebratory meals with clients can be appropriate aspects of many BluBOX business relationships, provided that they aren't excessive and don't create the appearance of impropriety.

3.7. Use of BluBOX Products and Services

Avoiding potential conflicts of interest also means that you should not use BluBOX products, services, internal tools, or information in a way that improperly benefits you or someone you know or creates the appearance that you have an unfair advantage over users outside of BluBOX. For example, you should never approve BluBOX accounts, services, or credits for yourself, your friends, or family members. Similarly, you should not use the tools, information, or access that you have as a BluBOX contributor to participate in or to generate a financial benefit for yourself or others. If you find yourself facing a conflict of interest regarding the use of BluBOX's products, please notify the COO or the CEO and seek appropriate permission.

4. Preserving Confidentiality

We seek press attention around our innovations and our culture, and that's usually fine. However, certain kinds of company information, if leaked prematurely into the press or to competitors, can hurt our product launches, eliminate our competitive advantage and prove costly in other ways. Our responsibilities extend beyond not revealing Confidential BluBOX material - we must also:

- Properly secure, label, and (when appropriate) dispose of Confidential BluBOX material;
- Safeguard Confidential information that BluBOX receives from others under non-disclosure agreements;
- Take steps to keep our trade secrets and other confidential intellectual property secret.

4.1. Confidential Information

Make sure that information that is classified as "Need to Know" or "Confidential" is handled in accordance with the BluBOX's Data Security Policy and Non-Disclosure Agreement(s).

At times, a particular project or negotiation may require you to disclose Need-to-Know or Confidential information to an outside party: Disclosure of that information should be on an "only as needed" basis and only under a non-disclosure agreement. In addition, BluBOX policy may require a prior security assessment of the outside party that is to receive the confidential information. Be sure to conduct the appropriate due diligence and have the appropriate agreement in place before you disclose the information.

There are, of course, "gray areas" in which you will need to apply your best judgment in making sure you don't disclose any confidential information. If you're in a gray area, be cautious in what advice or insight you provide or, better yet, ask for guidance from your manager, the COO or the CEO.

Finally, some of us will find ourselves having family or other personal relationships with people associated with our competitors or business partners. As in most cases, common sense applies. Don't tell such people anything confidential, and don't solicit confidential information from them either.

4.2. BluBOX Partners

Just as you are careful not to disclose confidential BluBOX information, it's equally important not to disclose any confidential information from our partners. Don't accept confidential information from other companies without first having all parties sign an appropriate Non-disclosure Agreement and having it countersigned by the COO or other authorized BluBOX officer. Even after the agreement is signed, try only to accept as much information as you need to accomplish your business objectives.

4.3. Competitors/Former Employers

We respect our competitors and want to compete with them fairly. But we don't want their confidential information. The same goes for confidential information belonging to any BOXER's former employers. If an opportunity arises to take advantage of a competitor's or former employer's confidential information, don't do it. Should you happen to come into possession of a competitor's confidential information, contact the COO or CEO immediately.

4.4. Outside Communications

BluBOX's policy is to be extremely careful about disclosing confidential proprietary information. Consistent with that, you should also ensure your outside communications (including online and social media posts) do not disclose confidential proprietary information or represent (or otherwise give the impression) that you are speaking on behalf of BluBOX unless you're authorized to do so by the company. The same applies to communications with the press. Finally, check with your manager, the COO or the CEO before accepting any public speaking engagement on behalf of the company.

5. Protecting BluBOX's Assets

BOXERs must always act to conserve company resources and protect company assets and information.

5.1. Intellectual Property

BluBOX's intellectual property rights (its trademarks, logos, copyrights, trade secrets, "know-how", and patents) are among its most valuable assets.

Unauthorized use can lead to their loss or serious loss of value. You must respect all copyright and other intellectual property laws, including laws governing the fair use of copyrights, trademarks, and brands. You must never use BluBOX's logos, marks, or other protected information or property

for any business or commercial venture without pre-clearance from the Marketing team. Report any suspected misuse of trademarks, logos, or other BluBOX intellectual property to Legal.

Likewise, respect the intellectual property rights of others. Inappropriate use of others' intellectual property may expose BluBOX and you to criminal and civil fines and penalties. Please seek before you solicit, accept, or use proprietary information from individuals outside the company or let them use or have access to BluBOX proprietary information. You should also check with your manager if you are developing a product that uses content not belonging to BluBOX.

A word about open source - BluBOX respects open source software development. Consistent with its policy of respecting the valid intellectual property rights of others, BluBOX will strictly comply with the license requirements under which open source software is distributed. Failing to do so may lead to legal claims against BluBOX, as well as significant damage to the company's reputation and its standing in the open source community. Please seek guidance from the CTO, COO or CEO before incorporating open source code into any BluBOX product, service, or internal project.

5.2. Company Equipment

BluBOX may give the tools and equipment that are needed to work more effectively, but it counts on recipients to be responsible and not wasteful with the BluBOX stuff that is provided. Nobody's going to complain if you snag an extra bagel on Friday morning, but company funds, equipment, and other physical assets are not to be requisitioned for purely personal use. Not sure if a certain use of company assets is okay? Please ask the CFO or the COO.

5.3. The Network

BluBOX's communication facilities (which include any subscription that it pays for, any network that it provides for BOXER use, and any hardware that it provides and is used to communicate or test, are a critical aspect of any company's property, both physical and intellectual. Be sure to report to the COO or CEO if you have any reason to believe that a security risk has been created - for example, if you lose your laptop or smart phone, think that one of your log-in credentials has been compromised, or that you have been victimized by malware or computer virus.

5.4. Use of BluBOX's Equipment and Facilities

Anything you do using BluBOX's corporate electronic facilities (e.g., its computers, mobile devices, network, etc.) or store on its premises (e.g., letters, memos, and other documents) might be disclosed to people inside and outside the company. For example, BluBOX may be required by law (e.g., in response to a subpoena or warrant) to monitor, access, and disclose the contents of corporate email, voicemail, computer files, and other materials on its electronic facilities or on its premises. In addition, the company may monitor, access, and disclose its contributors' communications and other information on its corporate electronic facilities or on its premises where there is a business need to do so, such as protecting contributors and users, maintaining the security of resources and property, or investigating suspected misconduct.

5.5. Contributor Data

BluBOX collects and stores personal information from its contributors. Such data should be accessed only in line with local law and BluBOX internal policies, and handled in line with BluBOX, personal data protection and privacy policies.

6. Ensuring Financial Integrity and Responsibility

Financial integrity and fiscal responsibility are core aspects of corporate professionalism. This is more than accurate reporting of the company's financials, though that's certainly important. The money any of us spends on behalf of BluBOX is not ours; it's the company's and, ultimately, the shareholders'. Each person at BluBOX - not just those in Finance - has a role in making sure that money is appropriately spent, financial records are complete and accurate, and internal controls are honored. This matters every time BluBOX hires a new vendor, a BOXER expenses something to BluBOX, signs a new business contract, or enters into any deal on BluBOX's behalf.

Stay in full compliance with BluBOX's internal controls, and don't hesitate to contact the COO or the CEO if you have any questions. What follows are some core concepts that lie at the foundation of BluBOX's goal of financial integrity and fiscal responsibility:

6.1. Spending BluBOX's Money

A core BluBOX value has always been to spend money wisely. When you submit an expense for reimbursement or spend money on BluBOX's behalf, make sure that the cost is reasonable, directly related to company business, and supported by appropriate documentation. Always record the business purpose (e.g., if you take someone out to dinner on BluBOX, always record the full names and titles of the people who attended as well as the reason for the dinner) and comply with other submission requirements. If you're uncertain about whether you should spend money or submit an expense for reimbursement, check with your manager. Managers are responsible for all money spent and expenses incurred by their direct reports, and should carefully review such spend and expenses before approving.

6.2. Signing a Contract

Each time a BOXER enters into a business transaction on BluBOX's behalf, documentation recording that agreement should be sent to the COO beforehand, and written approval by the COO is required. Signing a contract on behalf of BluBOX is a very big deal. Never sign any contract on behalf of BluBOX unless all of the following are met:

- You are authorized to sign under BluBOX's Signature Authority and Approval Policy. If you are unsure whether you are authorized, ask your manager.
- The contract has been approved by the COO.
- If you are using an approved BluBOX-standard contract, you don't need further approval unless you have made changes to the standard contract text or are using it for other than its intended

purpose.

- You have studied the contract, understood its terms, and decided that entering into it is in BluBOX's interest.

All contracts at BluBOX should be in writing and should contain all of the relevant terms to which the parties are agreeing - BluBOX does not permit "side agreements," oral or written.

6.3. Recording Transactions

If your job involves the financial recording of BluBOX transactions, make sure that you're fully familiar with all of BluBOX's policies that apply, including BluBOX's Revenue Recognition Policy and Purchasing Policy.

Immediately report to Finance any transactions that you think are not being recorded correctly.

6.4. Reporting Financial or Accounting Irregularities

It goes without saying (but we're going to say it anyway) that you should never, ever interfere in any way with the auditing of BluBOX's financial records.

Similarly, you should never falsify any record or account, including time reports, expense accounts, and any other BluBOX records.

If you suspect or observe any of the conduct mentioned above or, for that matter, any irregularities relating to financial integrity or fiscal responsibility, no matter how small, immediately report them to the CFO, COO or CEO.

6.5. Hiring Suppliers

Normally, it is the Purchasing Team's responsibility to solicit quotations and enter into supply agreements with suppliers of equipment or services.

As BluBOX grows, it will enter into more deals with such suppliers for equipment or services. You may sometimes be made responsible for identifying a supplier for materials or labor that will affect one of your projects. You should always strive for the best possible deal: this almost always requires soliciting competing bids but, while price is very important, it isn't the only factor worth considering. Quality, service, reliability, and the terms and conditions are also relevant factors.

Once you have identified one or more potential suppliers, send the information along with your recommendation to the Purchasing Team. It will contact the supplier and negotiate an Agreement.

6.6. Retaining Records

It's important to keep records for an appropriate length of time. The BluBOX Records Retention Policy suggests minimum record retention periods for certain types of records. These are great guidelines, but keep in mind that legal requirements, accounting rules, and other external sources

sometimes specify longer retention periods for certain types of records, and those control where applicable. In addition, if asked to retain records relevant to a litigation, audit, or investigation, do so until you are notified in writing by the CFO, COO or CEO that retention is no longer necessary. If you have any questions regarding the correct length of time to retain a record, contact the CFO, COO or CEO.

7. Obeying the Law

BluBOX takes its responsibilities to comply with laws and regulations very seriously and each BOXER is expected to comply with applicable legal requirements and prohibitions. While it's impossible for anyone to know all aspects of every applicable law, BOXERS should understand the major laws and regulations that apply to their work. A few specific laws are easy to violate unintentionally and so are worth pointing out here:

7.1. Trade Controls

U.S. and international trade laws control where BluBOX can send or receive its products and/or services. These laws are complex, and apply to:

- Imports and exports from or into the U.S.
- Imports and exports of products from or into other countries, with additional concerns when those products contain components or technology of U.S. origin
- Exports of services or the provision of services to non-U.S. persons
- Exports of technical data, especially when the technical data is of U.S. origin

What constitutes an "import" or "export" under the law is pretty broad. For example:

- Exposing or allowing access by non-U.S. persons to U.S. technical data can be an "export", regardless of what country the exposure occurred in
- Sending a server from one country ("country X") into another country ("country Y") is an export from country X and an import into country Y
- Permitting the download of software from one country ("country X") into another country ("country Y") is an export from country X
- Transporting technical data or software on your laptop, or tools or equipment in your luggage, may be an export and import

The bottom line: If you are in any way involved in sending or making available BluBOX products, services, software, equipment, or any form of technical data from one country to another, work with the BluBOX Finance Department to be absolutely sure that the transaction stays well within the bounds of applicable laws.

7.2. Competition Laws

Most countries have laws - known as "antitrust," "competition," or "unfair competition" laws - designed to promote free and fair competition. Generally speaking, these laws prohibit 1)

arrangements with competitors that restrain trade in some way, 2) abuse of intellectual property rights, and 3) use of market power to unfairly disadvantage competitors.

Certain conduct is absolutely prohibited under these laws, and could result in your imprisonment, not to mention severe penalties for BluBOX. Examples of prohibited conduct include:

- Agreeing with competitors about prices
- Agreeing with competitors to rig bids or to allocate customers or markets
- Agreeing with competitors to boycott a supplier or customer

Other activities can also be illegal, unfair, or create the appearance of impropriety. Such activities include:

- Sharing competitively sensitive information (e.g., prices, costs, market distribution, etc.) with competitors
- Entering into a business arrangement or pursuing a strategy with the sole purpose of harming a competitor
- Using BluBOX's size or strength to gain an unfair competitive advantage

Although the spirit of these laws is straightforward, their application to particular situations can be quite complex.

BluBOX is committed to competing fair and square, so please contact the CFO, COO or CEO if you have any questions about the antitrust laws and how they apply to you. Any contributor found to have violated Antitrust Policies will, subject to local laws, be disciplined, up to and including termination of employment. If you suspect that anyone at the company is violating the competition laws, notify the CFO, COO or CEO immediately.

7.3. Insider Trading Laws

As we said earlier, internally we share information, including non-public information, about BluBOX's business operations pretty freely. Or you may overhear a hallway conversation, or you may come across a memo in an e-mail trail, either of which might involve confidential information. To use this non-public information to buy or sell stock – yes, even our non-traded stock, or to pass it along to others so that they may do so, could constitute insider trading. Insider trading violates the law. Don't do it.

7.4. Anti-bribery Laws

Like all businesses, BluBOX is subject to lots of laws, U.S. today, but also non-U.S. tomorrow, that prohibit bribery in virtually every kind of commercial setting. The rule for us at BluBOX is simple - don't bribe anybody, anytime, for any reason.

7.5. Non-government relationships

You should be careful when you give gifts and pay for meals, entertainment, or other business courtesies on behalf of BluBOX. We want to avoid the possibility that the gift, entertainment, or other business courtesy could be perceived as a bribe, so it's always best to provide such business courtesies infrequently and, when you do, to keep the value moderate. Consult with your manager before providing any business courtesies and contact the CFO, COO or CEO if you have any questions.

7.6. Dealing with government officials

Offering gifts, entertainment, or other business courtesies that could be perceived as bribes becomes especially problematic if you're dealing with a government official. "Government officials" include any government employee; candidate for public office; or employee of government-owned or -controlled companies, public international organizations, or political parties. Several laws around the world, including the U.S. Foreign Corrupt Practices Act and the UK Bribery Act, specifically prohibit offering or giving anything of value to government officials to influence official action or to secure an improper advantage. This not only includes traditional gifts, but also things like meals, travel, political or charitable contributions, and job offers for government officials' relatives. Never give gifts to thank government officials for doing their jobs. By contrast, it can be permissible to make infrequent and moderate expenditures for gifts and business entertainment for government officials that are directly tied to promoting BluBOX's products or services (e.g., providing a modest meal at a day-long demonstration of BluBOX products).

Payment of such expenses can be acceptable (assuming they are permitted under local law) but may require pre-approval from the CFO, COO or CEO.

The U.S. also has strict rules that severely limit the ability of a company or its employees to give gifts and business courtesies to a U.S. government official and also limit the official's ability to accept such gifts. The Honest Leadership and Open Government Act prohibits giving any gifts, including travel and other courtesies, to Members, Officers, and employees of the U.S. Senate and House of Representatives unless they fit within one of a number of specific exceptions. Gifts to employees of the U.S. executive branch are also regulated and subject to limits. Finally, state and local government officials in the U.S. are also subject to additional legal restrictions. Consult with the CFO, COO or CEO before giving any such gifts or business courtesies and obtain all required pre-approvals.

In sum, before offering any gifts or business courtesies to a U.S. or other government official, you should consult with the CFO, COO or CEO and obtain a written pre-approval.

8. Conclusion

BluBOX aspires to be a different kind of company. It's impossible to spell out every possible ethical scenario it or its contributors might face. Instead, it relies on BOXERS' good judgment to uphold a high



standard of integrity for themselves and their company. We expect all BOXERS to be guided by both the letter and the spirit of this Code.

Sometimes, identifying the right thing to do isn't an easy call. If you aren't sure, don't be afraid to ask questions of your manager or of the CFO, COO or CEO.

And remember: if you see something that you think isn't right - speak up!

END OF DOCUMENT