

Efficient Power Conversion

Code of Conduct



VALUES • ETHICS • INTEGRITY

CONTENTS

The Code

The EPC Code of Conduct 03

The Character

Who Should Follow These Policies..... 04

What Employees Must Do 05

What Leaders Must Do 06

Be the Voice of Integrity..... 07

The Commitment

Regulatory Excellence 08

Responsible Sourcing of Materials..... 08

Improper Payments 09

Supplier Relationships 10

International Trade Compliance 11

Anti-Money Laundering 12

Working with Governments 13

Competition Law 14

Fair Employment Practices 15

Environment, Health & Safety 16

Securing EPC Operations 17

Intellectual Property 18

Cyber Security & Privacy 19

EPC Controllership 20

Conflicts of Interest 21

Insider Trading & Stock Tipping 22

Key Questions of Integrity..... 23



THE EPC

CODE OF CONDUCT

01

Be honest, fair and trustworthy in all of your EPC activities and relationships.

02

Obey applicable laws and regulations governing our business worldwide.

03

Fulfill your obligation to be the voice of integrity and promptly report any concerns you have about compliance with law, EPC policy or this Code.

04

Work to run the company in as competitive a way as possible — with speed, accountability and compliance.



FOLLOWING POLICY

The Code of Conduct must be followed by anyone who works for or represents EPC.

THIS INCLUDES:

- EPC directors, officers and employees.
- Subsidiaries and controlled affiliates. Entities in which EPC owns more than 50 percent of voting rights, or which EPC has the right to control, are required to adopt and follow EPC compliance policies.

Non-controlled affiliates should be encouraged to adopt and follow EPC compliance policies.

EPC employees working with third parties such as consultants, agents, sales representatives, distributors and independent contractors must:

- Require these parties to agree to comply with relevant aspects of EPC's compliance policies.
- Provide these parties with education and information about policy requirements.
- Take action, up to and including terminating a contract, after learning that a third party failed to abide by EPC's compliance policies.



This guide provides an introductory summary of the Code of Conduct policies.

Go to epc-co.com for more information and resources to help you.

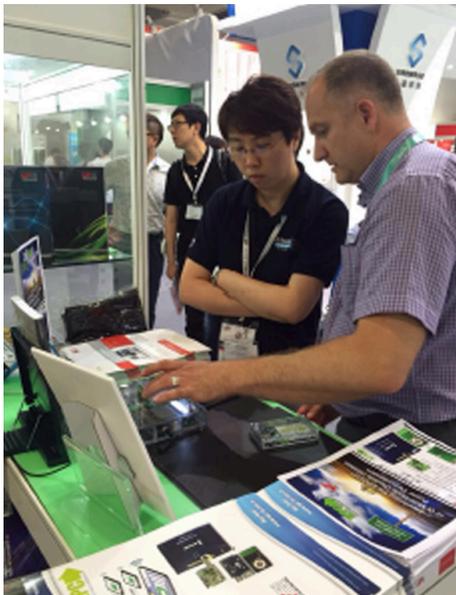
WHAT EMPLOYEES MUST DO

BE INTELLIGENT

Gain a basic understanding of the company policies.

Learn the details of any code of conduct policy that is relevant to your individual job responsibilities.

Learn about your detailed business and regional policies and procedures and understand how to apply them to your job.



BE AWARE

Stay informed on the developments in your area or industry that might impact EPC's compliance with laws and regulations or reputation in the marketplace.

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

BE COMMITTED

Promptly raise any concerns about potential violations of law or EPC policy.

Cooperate fully and honestly in EPC investigations related to integrity concerns.

THE COST OF NONCOMPLIANCE

Employees and leaders who do not fulfill their integrity responsibilities face disciplinary action up to and including the termination of their employment. The following examples of conduct can result in disciplinary action.

Some examples:

- Violating law or EPC policy or requesting that others do the same.
- Retaliating against another employee for reporting an integrity concern.
- Failing to promptly report a known or suspected violation of EPC's integrity policies.
- Failing to fully and honestly cooperate in EPC investigations of possible policy violations.
- Failing as a leader to diligently ensure compliance with EPC's integrity principles, policies and law.

WHAT LEADERS MUST DO

EPC holds its leaders accountable for creating a culture of compliance in which employees understand their responsibilities and feel comfortable raising concerns without fear of retaliation. Leaders' responsibilities span prevention, detection and response to compliance issues.



PREVENT

Personally set the example for integrity, not just through words, but more importantly, through actions.

Ensure employees understand that business results are never more important than ethical conduct and compliance with EPC policies.

Create an open environment in which every employee feels comfortable raising concerns.

Communicate the importance of compliance with sincerity and conviction at every appropriate opportunity.

Commit adequate resources to your business's compliance program.

DETECT

Lead compliance processes, through compliance review boards.



A leader is one who knows the way, goes the way, and shows the way.

Conduct periodic compliance reviews with the assistance of business compliance leaders and/or the Corporate Audit Staff.

Implement control measures such as "dashboards" and "scorecards" to detect heightened compliance risks and violations.

RESPOND

Document and escalate, any employee's expressed concern through the appropriate channels.

Take prompt corrective action to address identified compliance weaknesses.

Take appropriate disciplinary action.

Integrate employees' integrity contributions into evaluations and recognition and reward programs.

BE THE VOICE OF INTEGRITY

By being the Voice of Integrity at EPC we make our Company stronger and protect our colleagues from harm.

You do not need to be certain that a violation has occurred. At the same time, you have an obligation to promptly raise a concern when you see a situation in which our integrity principles or policies are not being followed.

Confidentiality is respected, and you may even choose to remain anonymous. However, if you identify yourself, we are able to follow up with you and provide feedback. Your identity and information will only be shared on a “need-to-know” basis. Any retaliation — whether direct or indirect — against employees who raise a concern is grounds for discipline up to and including dismissal.

HOW TO RAISE AN INTEGRITY CONCERN

GE offers several channels for raising concerns. You can choose to speak to someone about a potential integrity issue or put it in writing. Generally, your supervisor or manager will be in the best position to resolve an integrity concern, but other resources include:

- Your human resources leader.
- Your compliance leader or auditor.
- Company legal counsel.
- Next level of management.
- Your direct reporting to manager.
- An EPC corporate officer.

Nothing in this policy prevents you from reporting potential violations of law to relevant government authorities.



Integrity is essential and irreplaceable. It is the most valuable asset for a person, a company, or a society seeking to build and progress.

HOW WE HANDLE INTEGRITY CONCERNS

EPC fairly examines every integrity concern, and managers are required to escalate employees’ concerns to their manager. During the investigation process, EPC:

1. Forms an objective investigation team.
2. Determines the facts through interviews and/or the review of documents.
3. Recommends corrective action, if necessary.
4. Provides the person who raised the original concern (if that person is known) with feedback on the outcome.

RAISE A CONCERN

EPC Corporate Ombudsperson

The EPC ombudsperson process allows you to voice your integrity questions and concerns, anonymously if you prefer.

Efficient Power Conversion
909 N. Pacific Coast Highway
Suite 230
El Segundo CA 90245 U.S.A
ombudsperson@epc-co.com

EPC Compliance Officer

You can report concerns about EPC’s accounting, internal accounting controls or auditing matters, as well as other concerns, to the compliance officer.

EPC Compliance
909 N. Pacific Coast Highway
Suite 230
El Segundo, CA 90245 U.S.A. 310-615-0802
compliance@epc-co.com

REGULATORY EXCELLENCE



Commitment to the rule of law provides a basic assurance that people can know what to expect whether what they do is popular or unpopular at the time.

RESPONSIBILITIES OF EMPLOYEES

- **Know and comply** with the laws and regulatory requirements that affect your job responsibilities.
- **Treat regulators professionally**, with courtesy, honesty and respect at all times.
- **Coordinate with business or corporate experts** when working with or responding to requests from regulators.
- **Be the voice of integrity** and promptly escalate any potential issues that may lead to a regulatory compliance breach.

RESPONSIBILITIES OF LEADERS

- **Incorporate regulatory requirements** into business strategy and processes.
- **Assign owners to regulatory risk areas** and ask them to partner with appropriate EPC government affairs and regulatory experts.
- **Confirm you and your team have access to subject matter expertise** needed to manage regulatory risks.
- **Develop strong processes to anticipate risks**, including new and changing regulations.
- **Monitor regulatory compliance** on an ongoing basis and conduct periodic audits of key processes.

WHAT YOU SHOULD KNOW

In every market in which EPC operates, EPC must comply with an ever-expanding array of laws and regulations that are often being enforced more aggressively than ever before. In some cases, laws made by one country seek to regulate activities that take place outside of that country. This environment demands that every employee and leader be committed to regulatory excellence.

This document contains EPC's statement regarding the content of Conflict Minerals in our products. Conflict minerals are four particular metals (Tin, Tantalum, Tungsten or Gold), which when sourced from the Democratic Republic of the Congo and surrounding countries have a high risk of funding rebel groups or terrorist activity.

Based upon information collected from EPC's supply chain, EPC does not

knowingly use metals derived from the Conflict Region in our products.

We expect our suppliers to engage in due diligence to analyze their sources and to complete the EICC Conflict Minerals reporting template. Suppliers must ensure that all metals used to manufacture products for use by EPC originate from certified conflict-free smelters.

EPC conducts periodic reviews with our vendors to ensure that they are in compliance with this policy and we obtain certifications from these vendors that their metal supplies do not come from the Conflict Regions. If we become aware that our supply chain includes metals from the Conflict Region we will take action to promptly review the circumstances and remedy the situation as appropriate.

IMPROPER PAYMENTS

RULE TO REMEMBER

Do not permit or engage in bribery or corruption of any kind.

OUR POLICY

EPC prohibits bribery in all business dealings, in every country around the world, with both governments and the private sector.

EPC prohibits even small facilitation payments to expedite routine administrative actions, except in extraordinary circumstances and with the prior approval of a EPC compliance or business general counsel, or where an employee's safety or security is at stake. Our goal is to eliminate all facilitation payments.

We maintain strong controls aimed at preventing and detecting bribery. This includes a rigorous process for appointing and managing third parties acting on EPC's behalf in business dealings.

We maintain accurate books, records, and accounts that correctly reflect the true nature of all transactions.

YOUR ROLE

- **Never offer, promise, make, or authorize** a payment or the giving of anything of value to anyone in order to obtain an improper business advantage.
- **Remember that providing gifts, entertainment or anything else of value to government employees** is highly regulated and often prohibited. Do not provide such gifts and entertainment unless you have received prior EPC management approval.
- **Follow Corporate and business guidelines** regarding gifts and entertainment and other business courtesies.
- **Never contribute Company funds or other EPC assets for political purposes** without obtaining prior approval from EPC management.
- **Follow your business due diligence procedures** and require that any third party representing EPC be carefully selected and comply with this policy.



What You Should Know
Bribery means giving, offering or promising anything of value to gain an improper business advantage.

Facilitation payments are small customary amounts paid to government employees to expedite routine clerical or administrative actions such as issuing permits.

- **Treat with extreme caution** a demand from a third party to receive its commission payment prior to winning a deal/contract.
- **Be wary of any suggestion** to direct EPC business through a specific representative or partner due to a "special relationship."
- **Be suspicious of any request** to make a payment to a person who is not related to the transaction being discussed — or a request that payments be made in another country.
- **Watch out for commissions** that seem too large in relation to the services provided.

SUPPLIER RELATIONSHIPS

RULE TO REMEMBER

Work only with suppliers that uphold EPC's values and high integrity standards.

OUR POLICY

EPC's relationships with suppliers must be based on lawful and fair practices.

EPC provides suppliers a fair opportunity to earn a share of EPC's purchasing volume, including small businesses, and businesses owned by the disadvantaged, minorities, women and disabled veterans.

EPC only does business with suppliers that comply with all applicable legal requirements and EPC guidelines relating to labor, employment and environment, health and safety and that treat workers and others fairly and with respect.

EPC, as a business enterprise, promotes respect for human rights within our supply chain.

EPC safeguards information, including confidential and proprietary information and personal data, of both EPC and suppliers.

YOUR ROLE

- **Follow the procedures** set out in EPC's Supplier Responsibility Guidelines.
- **Be mindful of EPC's supplier diversity** program when choosing suppliers.
- **Protect EPC's confidential and proprietary information** including, where appropriate, with a confidentiality agreement. Also safeguard any confidential information or personal data that a supplier provides to EPC.
- **Avoid potential conflicts of interest** when you select a supplier, and never accept improper gifts or other items of value.



What You Should Know

EPC's reputation for integrity can be significantly affected by those whom we select to act as our suppliers.

- **Follow government acquisition regulations** when purchasing materials and services for use in fulfilling government contracts.
- **If you observe a suspected human rights violation** in EPC's supply chain, elevate the concern to your manager and/or compliance leader.
- **Always report issues and concerns regarding supplier relationships:** be the Voice of Integrity and talk to your manager or an EPC Executive Team member if you see unsafe conditions in supplier facilities, supplier employees who appear to be underage or subject to coercion, or an apparent disregard of environmental standards in supplier facilities.

INTERNATIONAL TRADE COMPLIANCE

RULE TO REMEMBER

Always know what you're exporting, its destination, the end user, and the end use.

Be sure to provide Customs with complete and accurate import documentation.

OUR POLICY

EPC will comply with all export control, economic sanctions and customs laws that regulate cross-border transfers of goods and technology.

YOUR ROLE - Customs

- Follow all business procedures relating to the import of goods.
- Only use EPC-approved Customs agents.
- Ensure you fully comply with special program requirements before you claim reduced duty rates.
- Report accurate, complete and timely information on import declarations, and provide accurate and complete product descriptions when classifying goods.

- Obtain approval from your customs team before hand-carrying any commercial product across a border.

YOUR ROLE - Expert Controls

- Follow all business procedures relating to the export of goods, software or technology.
- Use the export classification of goods, software or technology to determine if they require government authorization for export.
- Follow "Know Your Customer/ Know Your Supplier" procedures and the Corporate Watch list Screening Guidelines to ensure we do not do business with people or companies identified on government restricted party lists.
- Confirm all necessary licenses or authorizations are in place before any export transaction, and adhere to all export license or license exception requirements.

- Do not cooperate with any boycott of Israel or any other boycott or restrictive trade practice not authorized by the U.S. government. Seek legal counsel if a restrictive trade practice or boycott appears to conflict with the laws of another country.

WHAT YOU SHOULD KNOW

Export control laws regulate cross-border transfers of goods, software and technology that can be used for military or weapons proliferation purposes. Some countries also control the release of technical data to foreign nationals within their borders.

Customs laws regulate the movement (import and export) of goods across national borders or customs territories, even in the absence of a commercial transaction or import duties.

Sanctions (including embargoes and boycotts) can restrict trade in some or most goods and services.

ANTI-MONEY LAUNDERING

RULE TO REMEMBER

Always know your customer and be alert to possible illegal activity.

OUR POLICY

EPC is committed to complying with applicable anti-money laundering, corruption and terrorist financing laws and regulations.

EPC conducts business only with customers involved in legitimate business activities, with funds derived from legitimate sources.

We adhere to risk-based “Know Your Customer” due diligence processes on prospective customers.

EPC has controls to detect, investigate and report suspicious activity.

We recognize ALL risks introduced by third party and business partner relationships and mitigate those risks by, for example, performing watch-list screening.

YOUR ROLE

- **Collect and understand** documentation about prospective customers, agents and business partners to ensure that they are involved in legitimate business activities and that their funds come from legitimate sources.
- **Follow your business Know Your Customer** procedures and rules on collecting and verifying information from our customers and related parties.
- **Follow your business rules** concerning acceptable forms of payment. Learn the types of payments that have become associated with money laundering (for example, payments on behalf of a customer from an unknown person).

Some examples:

- Attempts by a customer to provide false information to open an account.
- Offers to pay in cash or overpayments followed by requests for refunds.



What You Should Know

Money laundering is the process of hiding the proceeds of crime or making the source appear legitimate.

The term “Customer” applies to any party contracted to obtain goods, services, credit or who opens an account.

- Orders, purchases or payments that are unusual or inconsistent with a customer’s trade or business.
- Unusually complex deal structures.
- Unusual fund transfers to or from countries unrelated to the transaction.
- Transactions that might have been structured to evade recording or reporting requirements.

WORKING WITH GOVERNMENTS

RULE TO REMEMBER

Never take shortcuts when dealing with government — be transparent, always comply.

OUR POLICY

EPC follows the highest ethical standards in conducting business with governments.

EPC commits to comply with all contract terms and conditions, laws, and regulations applicable to GE when working with governments.

We must be truthful and accurate when dealing with governments.

We maintain controls and procedures that target our government business activities specifically to ensure compliance in this highly regulated environment.

YOUR ROLE

- **Government business is different** — do not pursue government business without first engaging your legal counsel.
- **Before submitting a proposal to a government**, review the requirements with all applicable stakeholders and only accept those terms with which EPC can comply.
- **Do not accept internal government information** about its selection process nor information about a competitor's proposal unless the government contracting officer has specifically and lawfully authorized its release.
- **After award, perform all contract obligations strictly** in accordance with the terms of the agreement. For example, do not make any substitutions for the goods and services to be delivered, or deviate from requirements, without the written approval of the authorized government official.
- **Do not offer, promise, make or authorize the giving of anything of value** to a government employee that is inconsistent with Corporate and business guidelines.
- **Never enter into discussions** with government employees or people close to them about prospective employment of non-employees while they can influence decisions affecting EPC.
- **In the U.S., certain employees must pre-approve personal political contributions** for compliance with state and local "pay to play" laws. These employees are officers, directors, sales employees and their managers of EPC businesses

that seek U.S. state or local government contracts. If you are unsure whether you must pre-clear personal political contributions, contact your legal counsel or compliance leader.

BE AWARE

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. This includes an employee of any public agency/department, state instrumentality, or State-owned or -controlled enterprise. Outside the U.S., employees of public international organizations, candidates for elective office, political party officials, family members of government employees, and members of a royal family may also be considered Government Officials. **State-owned or -controlled enterprises** may include, for example, hospitals, oil companies, public utilities, railroads, airlines, TV stations, public universities, sovereign wealth funds, central banks, and pension funds.

COMPETITION LAW

RULE TO REMEMBER

Do not enter into any agreement with competitors that deprives customers of the benefits of competition.

OUR POLICY

Every EPC employee has a responsibility to comply with all applicable competition laws, regulations, decrees and orders.

EPC must never collude with other companies on price or terms to be offered to customers; agree with competitors to allocate markets or customers; or manipulate the bidding process.

YOUR ROLE

- **Do not propose or enter into any agreement** or understanding with any competitor about any aspect of competition between EPC and a competitor, including agreements on pricing, bidding, deal terms, wages or the allocation of markets or customers.
- **Do not propose or enter into any agreement with any other party** regarding whether or how to bid. Only submit bids if the purpose is to compete for and win a particular piece of business.
- **Avoid contacts of any kind with competitors** that could create the appearance of improper agreements or understandings. Actively disassociate yourself from any situations in which improper agreements or information sharing between competitors are raised, and promptly inform your legal counsel.
- **Understand and follow your business's specific guidelines about contacts with competitors**, obtaining and handling competitive information, and participating in trade and professional associations.
- **Avoid agreements or understandings that restrict the price** at which a party may resell a product or service.
- **Do not provide, receive or exchange any of the following types of information with a competitor** or its representative, whether in person, electronically or at an industry meeting:
 - Prices.
 - Bids.
 - Customers, suppliers, sales territories or product lines.
 - Terms or conditions of sale.
- Production, sales capacity or volume.
- Costs, profits or margins.
- Market share.
- Sales, marketing or development strategies for products or services.
- Distribution methods.

Talk to your legal counsel before implementing any of the following:

- Sale of multiple EPC products in "bundles."
- Exclusive arrangements.
- Technology licenses that restrict the freedom of the licensee or licensor.
- Price discounts that depend on loyalty or volume or are offered only to certain customers.
- Pricing initiatives.
- Distribution or supply arrangements with competitors.
- Policies concerning access of customers and third parties to parts, software and other inputs for the servicing of EPC equipment.
- Any proposed merger, acquisition or joint venture.

FAIR EMPLOYMENT PRACTICES

RULE TO REMEMBER

Treat all employees fairly and with respect.

OUR POLICY

EPC bases employment decisions on job qualifications and merit which include education, experience, skills, ability, performance, and growth values.

Employment decisions should also be made without considering a person's race, color, religion, national or ethnic origin, sex (including pregnancy), sexual orientation, gender identity or expression, age, disability, veteran status or other characteristic protected by law.

We respect human rights We communicate our values and expectations through our policies, setting a high bar for ourselves and our partners and clarifying that we do not tolerate modern slavery. We are committed to consistently evolving and improving our approach. We regularly review our policies to identify areas for update and improvement.

Global Human Rights Principles EPC is committed to ensuring the people and communities that support our business are treated with fundamental dignity and respect. These values have been long-held at

EPC, and codifying them into a set of Global Human Rights Principles demonstrates our support for fundamental human rights and the dignity of workers everywhere we operate around the world. We strive to ensure the products and services we provide are produced in a way that respects internationally recognized human rights, including the right to freely chosen employment. We do not tolerate child labor, forced labor, or human trafficking in any form—including slave labor, prison labor, indentured servitude, or bonded labor—in our operations or value chain. Our commitment and approach are informed by leading international standards and frameworks developed by the United Nations (UN) and ILO.

EPC will comply 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, trafficking in persons and employment discrimination.

We take affirmative action where required by law to increase opportunities in employment for women, minorities, people with disabilities and certain veterans.

We respect employees' privacy rights and will use, maintain and



What You Should Know

EPC absolutely prohibits taking adverse action against an employee because he/she has raised a concern about a violation of policy or law.

transfer personal data in accordance with EPC's Employment Data Protection Standards, related procedures and local law.

YOUR ROLE

- **You may not refuse to work or cooperate** with others because of characteristics covered by this policy such as race, religion, sex, age, or other characteristic protected by law.
- **Create a work environment free from harassment** on the basis of any protected characteristic, and free from bullying.
- **Never make an unwelcome sexual advance** to an employee or other person with whom you work.
- **Never disclose employment data** to a person who does not have a business need, the authority, or, where required, the subject's consent.
- **Consult with your manager** if you encounter a conflict between this policy and local laws, customs or practices.

ENVIRONMENT, HEALTH & SAFETY

RULE TO REMEMBER

Follow EHS procedures and be alert to environmental and safety hazards in your workplace.

OUR POLICY

EPC strictly complies with all environmental, health, and safety (EHS) laws that apply to our operations.

We develop and follow safe work procedures to ensure workplace safety and prevent injuries.

We install, maintain, and monitor environmental controls to ensure our emissions meet legal limits.

We assess the EHS risks of any new activity, whether designing a new product, selling in a new market, building a new factory, or buying a new business.

Our EHS principles apply to everything we do — from making or servicing products and buying businesses to driving vehicles and disposing of waste.

YOUR ROLE

- **Understand and comply with all the EHS policies** that apply to you, including Corporate policies, business policies, and any specific policies that apply to your site, position, or operation.
- **Implement EPC management tools and processes** to find and fix EHS concerns at your site.
- **Follow Corporate and business policies** for managing, shipping, transporting, importing/exporting and disposing of hazardous materials and chemicals.
- **Question unsafe or improper operations**, and insist on a “stop work” if necessary to address them.

BE THE VOICE OF INTEGRITY

Eliminating or guarding against hazards starts with identifying them. You must alert supervisors or EHS leaders if you are aware of hazards or standards that are being ignored or hidden.



At the end of the day, the goals are simple: safety and security.

Red flags include:

- Failure to obtain or comply with regulatory permits.
- Deviations from written work practices—even if these deviations have become “routine.”
- Lapses in security or emergency preparedness.
- Inadequately maintained tools or equipment.
- Missing machine guards or faulty protective equipment.
- Unsafe driving.
- Failure to use lock-out, tag-out procedures or fall protection.
- Improperly shipped wastes or hazardous products.
- Unsafe customer sites.



*Don't wait until
you are in a crisis
to develop a crisis
management plan.*

SECURING EPC OPERATIONS GLOBALLY

RULE TO REMEMBER

EPC has no greater responsibility than to protect its people and operations.

OUR POLICY

We implement rigorous **Security and Crisis Management (SCM) plans** designed to ensure the security of our people and operations globally. Our SCM plans include a process for identifying, and protecting against, the risks posed by man-made or natural incidents that affect our people, facilities, information technology assets and systems, or products, services and supply chain.

Communicate, as appropriate, about prevention, emergency response and business continuation with the EPC community, government officials, the media and the public.

YOUR ROLE

- **Maintain situational awareness.** Help us protect you, your colleagues, and visitors; know your surroundings.
- **Comply with EPC travel policies.** Make use of the Travel Advisory System when planning travel.
- **Make travel arrangements with EPC's preferred travel partners.** Obtain pre-clearances to designated countries.
- **Create and maintain a safe working environment.** Identify and report indicators or incidents of workplace violence to your manager.
- **Conduct rigorous background checks** on new hires and contractors as permitted by law.
- **Observe Global Immigration Rules** by ensuring your employees and invited guests comply with global immigration regulations when traveling.

- **Be an active participant** in Crisis Management, Business Continuity, and workplace violence prevention drills and security awareness sessions to ensure you have the knowledge to remain safe at work, home and on the road.

INTELLECTUAL PROPERTY

RULE TO REMEMBER

Every EPC employee has a responsibility to safeguard EPC's intellectual property — it is the key to our competitive advantage.

OUR POLICY

EPC aggressively protects its intellectual property (IP) and enforces its rights against others who take or use EPC IP without proper authorization.

EPC respects valid IP rights and avoids unauthorized use of IP that belongs to other people or organizations.

EPC must own the IP created by its employees as part of their employment. We require employees to review and sign EPC's Employee Innovation and Proprietary Information Agreement (EIPIA).

YOUR ROLE

- **Classify, label, store and share all EPC data, information and documents** in accordance with EPC's Data Classification Policy, and ensure that access to information and documents is granted only to individuals with a legitimate need.
- **Only use or distribute EPC's proprietary information for the benefit of EPC**, and not for personal gain.
- **Do not take, access, provide access to, or use any of EPC's proprietary information or other IP** without authorization after leaving EPC.
- **Consult with your manager if you have any questions or concerns** regarding how to identify, handle and protect EPC's IP.
- **Do not bring, access, keep, share or use a third party's proprietary information**, especially proprietary information from a previous employer, without first consulting with and receiving prior approval from your IP counsel.
- **Do not provide EPC's proprietary information** to a third party without the proper internal approval and the necessary confidentiality agreement with the third party.
- **Do not use any source code or other software from a third party in any EPC product or as a tool without obtaining prior approval.**
- **Direct each unsolicited third party suggestion** for new or improved EPC products, features or services to the info@epc-co.com email.

WHAT YOU SHOULD KNOW

IP is among EPC's most valuable assets.

Every employee creates, uses, accesses or has access to IP every day.

IP includes patents, trade secrets, trademarks, copyrights and designs and helps protect EPC's inventions, manufacturing processes, brands, business plans, marketing documents and graphics, software, product shapes, proprietary information and many other things.

Proprietary information is information that is undisclosed, for example, not publicly known or generally available, and that is held in confidence.

CYBER SECURITY & PRIVACY

RULE TO REMEMBER

Respect privacy rights and protect against cyber risks to EPC information, networks and products.

OUR POLICY

EPC respects individual privacy rights. EPC is committed to collecting, handling and protecting Personal Information responsibly, and in compliance with applicable privacy and information security laws and with EPC's Commitment to the Protection of Personal Information (EPC's Binding Corporate Rules), where applicable.

EPC may transfer Personal Information globally, consistent with applicable law.

EPC seeks to protect its networks, systems, devices and information in our possession. It is our policy to use information only for legitimate purposes and to maintain appropriate access controls.

EPC's policy is to conduct security testing on our products prior to release and to monitor for cyber -security threats and vulnerabilities.

YOUR ROLE

- **If you have responsibility for software, IT or product development,** follow EPC guidelines for

Secure Software Development. Ensure appropriate vulnerability testing prior to release, monitor for potential threats and vulnerabilities, and let customers know how to report any potential vulnerabilities they find to EPC.

- **Communicate as appropriate with customers** about cyber-security issues.
- **Contact your manager** prior to participating in efforts to develop industry standards around cyber-security, or engaging an outside firm or individual to perform vulnerability testing.
- **Limit access to EPC information to authorized individuals** who need it for legitimate business purposes.
- **Prevent unauthorized access, accidental loss, disclosure or destruction of EPC information:**
- **Secure physical copies and storage areas.**
- **Use strong passwords;** don't share your password with anyone.
- **Use only EPC-approved systems** and tools for storage, transmission and backup of EPC information. Do not use personal email, unapproved devices or software to conduct EPC business.

- **When posting information on line,** do not disclose Personal Information, trade secrets, proprietary or other commercially sensitive information.
- **Know the signs of phishing** and recognize efforts to improperly acquire EPC information.
- **Consult with your manager** before implementing new or significantly modified processes that use Personal Information, including new software or code.

BE AWARE

Personal Information is any information relating to a directly or indirectly identifiable person (or in some cases, a company); examples include name, address, email, phone, national identifier and credit card number.

Also, Cyber Security & Privacy incidents can happen in a number of ways. Report any risks or incidents at info@epc-co.com including:

- Possible loss or theft of data, including lost laptops and other computing equipment.
- Loss, misuse or improper access to data.
- Security issues involving a EPC product or system.

EPC CONTROLLERSHIP

RULE TO REMEMBER

Be honest, complete and accurate in our accounting, communications and decision-making.

OUR POLICY

EPC accounting and reporting will faithfully reflect the economic substance of the Company's business activities, consistent with generally accepted accounting principles, standards, and regulations for accounting and financial reporting.

We will prepare timely, accurate and complete financial information for use in reports to management and other stakeholders.

We will ensure that management decisions are based on sound economic analysis based on complete facts with appropriate consideration of short- and long-term risks.

We will comply with all Company policies and applicable laws and regulations relating to the preservation of documents and records.

YOUR ROLE

- **Maintain effective processes and internal controls** that fairly reflect transactions or events, as well as prevent or detect inappropriate transactions.
- **Protect EPC's physical, financial and intellectual property assets.**
- **Maintain complete, accurate and timely records** and accounts to appropriately reflect all business transactions.
- **Create documents that are factual, accurate and complete,** and follow Company policies in deciding when to retain and dispose of them.
- **Avoid transactions that diminish share- owner value** even if they enhance near-term financial performance.
- **Never engage in inappropriate transactions,** including those that misrepresent the reporting of other parties such as customers or suppliers.
- **Seek the advice of your Controllership team** if you become aware of a questionable transaction.



A good financial plan is a road map that shows us exactly how the choices we make today will affect our future.

BE THE VOICE OF INTEGRITY

Raise a concern if you become aware of actions, transactions, accounting or reporting that are inconsistent with our controllership values and the protection of EPC's reputation.

Red flags include:

- Financial results that seem inconsistent with underlying performance.
- Circumventing review and approval procedures.
- Incomplete or misleading communications about the substance or reporting of a transaction.

CONFLICTS OF INTEREST

RULE TO REMEMBER

Always make business decisions based on what is best for EPC, never what is best for you personally.

OUR POLICY

You have a duty to ensure that nothing interferes with your ability to make all business decisions in the best interest of EPC. This means that nothing you do should interfere, or appear to interfere, with your responsibility for objective and unbiased decision-making on behalf of the Company.

No activity at work or from home should harm EPC's reputation or good name.

You have a duty to disclose if your personal or financial activities may interfere or have the potential of interfering with your allegiance toward the Company.

Misusing EPC resources or influence is prohibited. Even

when nothing wrong is intended, the perception of a conflict of interest may have negative effects.

YOUR ROLE

- **Obtain prior approval** from your manager before hiring, promoting or directly supervising a family member or close friend.
- **Obtain prior approval before accepting officer or director positions** with an outside business or not-for-profit organization. This excludes religious or school (non-University) affiliations.
- **Disclose financial interests** you may have in a company where you could personally affect EPC's business with that company.
- **Do not accept gifts** other than those of nominal value from suppliers, customers or competitors.
- **Do not accept personal discounts** or other benefits from



What You Should Know

A conflict of interest is not necessarily a violation of EPC policy; failing to promptly disclose a conflict is always a violation.

Disclosing potential conflicts of interest allows your management team to mitigate risks which may influence your business decisions.

suppliers or customers if they are not available to the general public or your EPC peers.

- **While incidental use may be acceptable, do not use EPC resources**, intellectual property, time or facilities for personal gain. Avoid any activity which creates the potential perception of a conflict between your personal interests and the interests of EPC.

INSIDER TRADING & STOCK TIPPING

RULE TO REMEMBER

EPC employees are prohibited from using or disclosing material non-public information about EPC or other companies.

OUR POLICY

Do not use or share material non-public information for financial or any other personal benefit.

YOUR ROLE

- **Do not recommend or suggest that anyone else buy or sell the securities of any company — including EPC—**while you have material inside information about that company.
- **Only share material inside information on a need-to-know basis.**
- **Avoid sharing material** inside information with anyone outside EPC unless it is necessary for EPC's business activities and

proper controls are in place (such as a non-disclosure agreement with a supplier).

- **Do not serve as an independent consultant or expert** outside of EPC on business matters within the scope of your EPC employment.
- **Refrain from discussing EPC business** with family and friends.
- **Follow additional requirements for the buying and selling of securities** if required by the nature of your job or business.

Inside Information is information you may learn in your job about EPC or other companies that has not been made public.

Using material inside information for your financial or other personal benefit, or sharing it with others, violates **EPC's insider trading policy and may violate the law.**

Inside information is material if a reasonable investor would consider it important in deciding to buy, hold or sell securities, or if publication would likely affect a company's stock price. Examples include:

- Financial forecasts.
- Earnings/dividend announcements.
- Proposed acquisitions or divestitures.
- Strategic plans.
- Regulatory actions.
- Changes in top management.

Stock tipping means sharing inside information about EPC or another company — for example, to a relative, colleague, or friend — to enable the person to buy or sell stock or other securities of the company on the basis of such information.

KEY QUESTIONS OF INTEGRITY

The EPC Employee Code of Conduct is not a substitute for your good judgment, and it cannot cover every conceivable situation. You should be alert to signs that you or your colleagues are in an integrity gray area and ask yourself three simple questions if you have any doubts about what you should do.

REMEMBER

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

01

How would this decision look to others within EPC and externally?

02

Am I willing to be held accountable for this decision?

03

Is this consistent with EPC's Code of Conduct?



EPC Contact Information

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