

Sionic Mobile Corporation (“Sionic”)

Code of Conduct and Ethics

Sionic is committed to operating with the highest standards of ethical conduct. We believe that our success depends on the trust and confidence of our customers, employees, and partners. This Code of Conduct outlines the values and principles that guide our behavior.

Our Values

Our values are at the core of our company culture and guide our decision-making process. By living these values, we cultivate a thriving workplace, create synergies, fuel innovation and collaboration, and foster positive and lasting business relationships through mutual trust and respect.

- **Honor human dignity and rights.** We believe that all people are created equal and deserve to be treated with respect. We strive to create a workplace where everyone feels safe and respected, regardless of their race, gender, religion, sexual orientation, or any other personal characteristic.
- **Be accountable.** We believe that we are all responsible for our actions and that we should be held accountable for the things we say and do. We build trust by being transparent and honest with each other and our stakeholders.
- **Do the right thing.** We believe that it is always important to do the right thing, even when it is difficult. We are committed to making ethical decisions, even when they may not be the most popular or profitable.
- **Speak up.** We believe that it is important to speak up when we see something that is wrong. We are free to speak up if we see potentially unethical or illegal behavior, and we take action to address any concerns that are identified.

Our Relationships

Our relationships are built on trust, respect, and transparency. We believe that these are the essential ingredients for a successful and lasting relationship. We are committed to building these relationships with:

- **Customers:** We listen to our customers' feedback and use it to improve our products and services. We are always clear, fair, and candid with our customers about our business practices.
- **Each other:** We treat each other with respect and dignity. We value diversity and inclusion, and we create a workplace where everyone feels comfortable sharing their voice, is respected for their ideas, and empowered to contribute to our success.
- **Partners, vendors, and representatives:** We build strong partnerships with our suppliers and vendors. We maintain confidentiality, interact with integrity, and work collaboratively to achieve mutually beneficial goals.
- **Regulatory bodies, investors, and the public:** We comply with all applicable laws and

regulations. We provide timely, accurate, and comprehensive information about the company's financial performance, business strategies, and material risks. We conduct all interactions with honesty, integrity, and respect.

Our Workplace

We are committed to creating a working environment where employees can thrive. We believe that a positive and supportive work environment is essential for employee productivity and well-being. We strive to create a workplace where employees feel valued, respected, and supported:

- **Diversity and inclusion:** We believe that a diverse and inclusive workplace is essential for innovation and success. We are committed to creating a welcoming and supportive environment for all employees, regardless of race, ethnicity, gender, sexual orientation, religion, or disability.
- **Employee safety:** We are committed to maintaining a safe and healthy work environment that meets all applicable safety regulations and standards. We openly communicate and report safety concerns to prevent hazardous occurrences. We encourage healthy lifestyles to promote overall well-being.
- **Teamwork:** We believe that teamwork is essential for success. We leverage the diverse strengths and perspectives of our team members and acknowledge that we can achieve more innovative and effective solutions than any individual could alone. We share knowledge, overcome challenges, and celebrate successes as a unit.
- **Communication:** We believe that communication is essential for a successful workplace. We openly share information, ideas, and constructive feedback while demonstrating respect for diverse viewpoints.
- **Innovation:** We are committed to innovation. We encourage our employees to think outside the box, challenge assumptions, and develop new and innovative solutions. We empower our employees to explore new ideas and experiment with different approaches, even if there's a chance of failure.
- **Customer service:** We are committed to providing excellent customer service. We encourage employees to see things from the customer's perspective and understand their challenges. We actively anticipate customer needs and proactively develop solutions that are convenient, safe, and intuitive.
- **Personal growth:** We support higher learning and subject matter certifications, involvement in civic and community activities, networking with peers, and participation in industry events where Sionic may add expertise and experience.

Our Business Practices

We are committed to conducting our business in a fair and ethical manner. We have adopted the following business practices to ensure that we meet the highest standards of conduct:

- **Anti-corruption:** We strictly prohibit any form of corruption, including bribery, extortion, and kickbacks. We have a zero-tolerance policy for corruption and will investigate and take appropriate action against any employee who is suspected of engaging in corrupt

behavior.

- **Avoid conflicts of interest:** We avoid conflicts of interest that compromise our ability to make objective decisions. Our conflict of interest policy is designed to avoid improper acts and situations that might give an appearance of impropriety or impair good judgment when acting on behalf of the Company.
- **Reasonable gifts/entertainment:** We accept gifts and entertainment only if they are given in a professional manner and do not create a conflict of interest. Our gifts and entertainment policy outlines the types of gifts and entertainment that we can accept and the limits on the value and frequency of those gifts and entertainment.
- **Fair and honest commerce:** We prohibit unfair, deceptive, or abusive practices while conducting business activities. We compete fairly and ethically with our competitors. We do not engage in practices that give us an unfair advantage, such as price fixing, collusion, and predatory pricing.
- **Ethical partnerships:** We only partner with ethical businesses that share our commitment to high standards of conduct. Our third-party management program is built on the principles of shared values, alignment of goals, sustainability, consumer protection, transparency, respect, and trust.

We believe that these business practices are essential to maintaining our reputation for integrity and ethical conduct. We are committed to upholding these standards and to continuously improving our business practices.

Our Responsibilities

We are committed to meeting our legal obligations and acting responsibly. We comply with all applicable laws, regulations, and standards and take all reasonable steps to avoid harm to our customers, employees, company, and the environment. We strive to be good corporate citizens and support the communities in which we operate.

- **We comply with all applicable laws and regulations.** We are dedicated to fostering a culture of integrity and transparency in everything we do. We prioritize compliance with all applicable laws and regulations and go beyond simply following the rules. We actively uphold the highest legal and ethical standards through a comprehensive compliance program.
- **We act with honesty and integrity in all our dealings.** We are transparent in all our communications, treat everyone with fairness and respect, and hold ourselves accountable to the highest ethical standards. This means, for example, selecting responsible vendors, ensuring our advertising is truthful, and being upfront about our capabilities and services.
- **We respect the privacy of our customers, employees, and partners.** We take data security seriously and implement industry-standard safeguards to protect confidential information. We are transparent about how we collect and use data, providing clear privacy policies and offering choices about how information is used.
- **We use information responsibly.** We collect data with a clear purpose, minimize what we collect, and maintain its accuracy. We keep data for as long as necessary for the

intended purpose and then securely delete it.

- **We champion fairness.** We treat everyone with respect and dignity, regardless of background or circumstance. We prioritize fairness, ethics, and transparency in developing and using AI. We actively work to ensure our AI systems are unbiased and don't discriminate against individuals or groups.
- **We protect our assets.** We are committed to protecting our assets and continuously review our security measures to ensure they are effective. We protect our intellectual property, including our trademarks, patents, copyrights, and trade secrets. We take steps to prevent unauthorized use of our intellectual property.
- **We maintain accurate and complete records.** We have procedures in place to protect our records from unauthorized access, use, or disclosure. We maintain accurate and complete financial records. We comply with all applicable accounting standards and regulations. We provide accurate and timely financial information to our stakeholders.
- **We consider our impact on the environment.** We are committed to reducing our environmental footprint and working towards a sustainable future, and are constantly looking for ways to improve our practices. We believe that we have a responsibility to protect the planet for future generations, and we are working hard to do our part.
- **We support the community.** We are committed to supporting the community in which we operate and believe that a strong community is essential for a healthy and prosperous economy. We believe that everyone deserves to have access to opportunities that will help them reach their full potential.

Our Commitment

We are committed to upholding this Code of Conduct. We expect all employees, contractors, and partners to comply with these standards. Any employee or contractor who believes that another employee or contractor has violated this Code of Conduct should report the violation to their supervisor or to the Compliance department.

Violations

Violations of this Code of Conduct may result in disciplinary action, up to and including termination of employment.

Review

This Code of Conduct will be reviewed periodically and updated as needed.