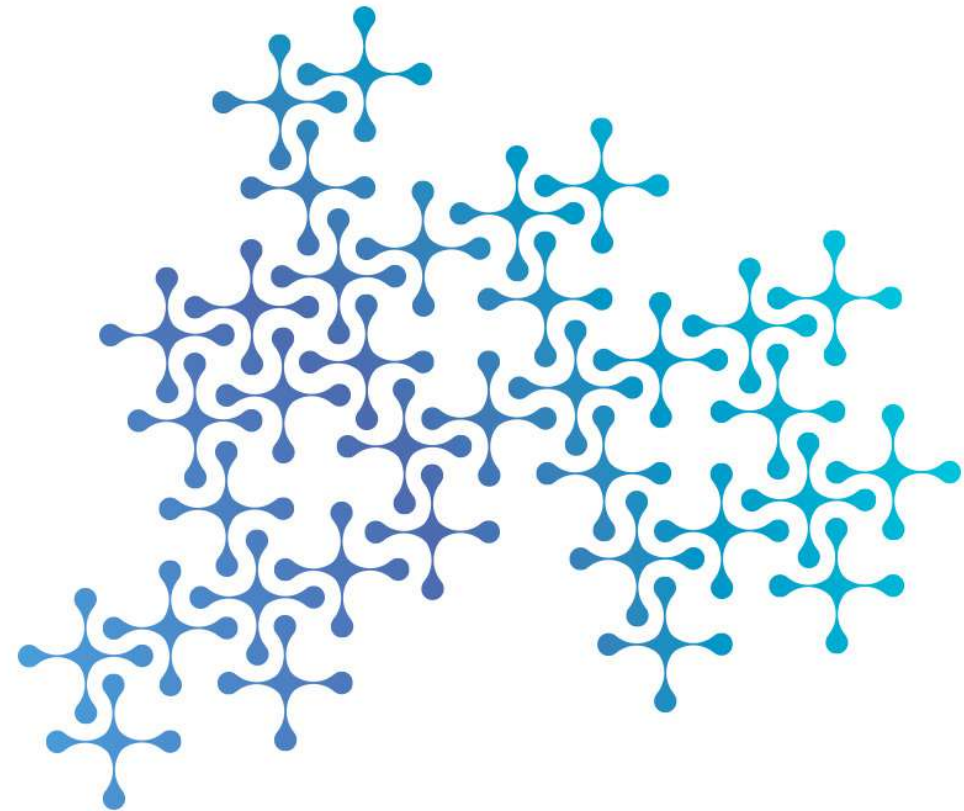


artefaktum.

CODE OF BUSINESS CONDUCT



A Message from
Felix Juhl
Chairman and CEO

Hello Artisans,

At Artefaktum, we pride ourselves on our culture and our company values. We strive to embody them in everything we do. Just as important are the underlying common principles of [Integrity](#), [Honesty](#) and [Respect for Others](#)—these truly define Artefaktum and are at the heart of Artefaktum’s Code of Conduct.

Our Code of Conduct goes beyond merely fulfilling legal requirements—at Artefaktum, conduct counts. As we cultivate a company culture that attracts and inspires the very best, we must comply with laws of the countries we live in. And, more importantly, we have to act with the highest ethical standards because it is the right thing to do. We respect one another. We don’t discriminate. We always respect individual cultures and backgrounds.

As you go through the Code, remember that you are accountable to act within our guidelines and uphold our standards. We also must hold each other accountable.

If something needs to be corrected, speak up. If necessary, take action. Often, the right course of action is obvious, but if not, our Code can guide you in making the right choices.

If faced with an ethical or legal dilemma, please raise your concerns with your manager, Human Resources or Legal—or through our hotline or web portal. If in doubt, ask! And if you’re worried about a fellow Artisan, help make things right for one of our own.

I look to each and every Artisan to uphold our values and our commitments every day. We are building a world-class global company and by adhering to our principles and embracing our values, we ensure our collective success.

I look forward to working with you each and every day to make Artefaktum a great place to work.

Thank you,



Felix Juhl
Chairman and CEO

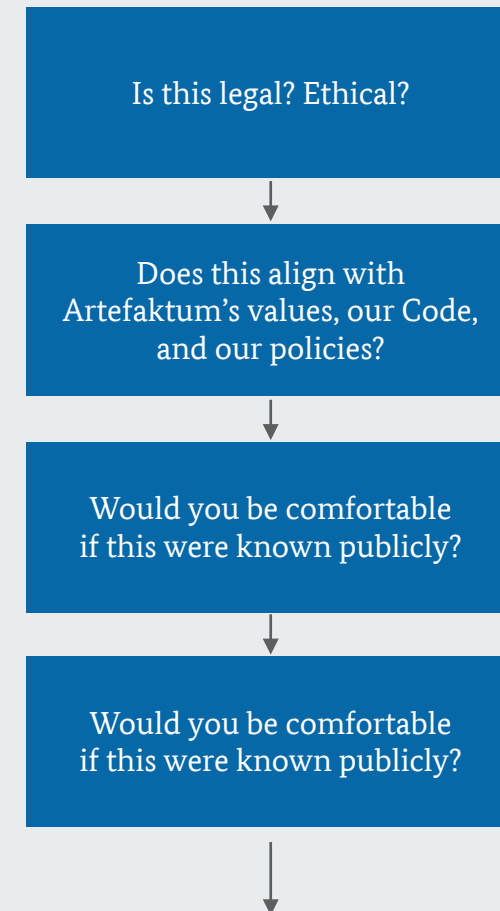


Why we have a Code

Artefaktum is founded on integrity and mutual respect, and we are steadfast in our commitment to live out these principles through our core values—persistence, creativity, teamwork, ownership, and customer-first. We are passionate about maintaining the highest standards of business conduct and ethics, guided by this Code of Conduct. Our Code reflects our business practices and behavioural principles, and will help guide you in preserving our reputation and values.

ETHICAL DECISION TREE

When you take action at Artefaktum, ask yourself the following



If you answered „no“ to any of the above, do **not** proceed.
Still unsure. Ask for help!

Our Code Applies to All

Our Code applies to all Artefaktum employees, officers and board members. We also expect that our contractors, partners, service providers, customers, suppliers, and vendors conform to these standards when working on behalf of Artefaktum. We're committed to acting in an ethical and legal manner and believe ethical conduct is more important than business performance.

This Code—in addition to our policies and procedures—addresses how to properly interact with various people and entities. We trust and expect you can apply common sense and the highest ethical standards when making business decisions—even when there is no stated guideline.

Violations of these standards may result in disciplinary action, which range from a warning to termination of employment and, in appropriate cases, legal action or referral to the appropriate legal authorities.

Speak Up!

Don't hesitate to ask questions, voice concerns, or get clarification. You are empowered and expected to report suspected violations of this Code, without fear of any form of retaliation.

Managers have additional responsibilities

As a manager, it's important that you foster and promote a culture of integrity. Discuss the importance of ethics and integrity with your team and encourage a Speak Up culture by empowering employees to come forward if they have questions or concerns, without fear of retaliation. If an employee raises a question or concern about the Code, listen carefully and give the employee your complete attention.

If the concern requires advice or investigation, contact the Human Resources or Legal teams for help.

Reporting Possible Violations

Any appearance of impropriety can be damaging and should be avoided. If you are unclear on a particular course of action, promptly discuss the matter with your manager or the Compliance Officer (our General Counsel).



If you're aware of a suspected or actual violation of Code standards by others, you have a responsibility to report it.

We ask that you promptly provide a specific description of the violation you believe has occurred, including any information you have about the persons involved and time of the violation.

Managers are required to report any complaints or observations of Code violations to the Compliance Officer. If you believe your manager has not taken appropriate action, you should contact the Compliance Officer directly. The Compliance Officer will investigate all reported possible Code violations promptly and with the highest degree of confidentiality that is possible under the specific circumstances. Neither you nor your manager may conduct any preliminary investigation, unless authorised to do so by the Compliance Officer. Your cooperation in the investigation will be expected.

As needed, the Compliance Officer will consult with legal counsel, the Human Resources team and/or Audit Committee of the Board of Directors. It is our policy to employ a fair process to determine possible violations of this Code.

With respect to complaints or observations of violations that may involve accounting, internal accounting controls and auditing concerns, under our speak up policy, the Compliance Officer shall promptly inform the Audit Committee, who shall supervise and oversee the inquiry and any investigation that is undertaken. If a potential violation is reported via the confidential hotline or email address as set forth on this page, the Audit Committee will be notified. In addition, you may report issues or concerns directly to the Audit Committee of our Board of Directors by email to audit@artefaktum.net or by mail to 177 Huntington Ave, PMB 55172, Boston, MA 02115

OBTAINING HELP

When you have concerns or questions, please contact one of the following resources:

- Your manager;
- Human Resources;
- Artefaktum Legal Dept.;
- Artefaktum's Compliance Officer;
- call 1-617-861-9250

No Retaliation

Inquiries or reports are handled anonymously and treated as confidential to the maximum extent possible. You will never be subject to retaliation for reporting, in good faith, a possible violation of this Code. We will take prompt disciplinary action against any employee who retaliates against you, including potential termination of employment. If you believe you are being retaliated against, please contact the Compliance Officer immediately.

No Excuses

Artefaktum is committed to promoting the highest standards of integrity by operating in an honest and ethical manner. Our culture and reputation depend on the honesty, fairness and integrity brought to the job by each person associated with us.



Discrimination, Harassment and Bullying

As detailed in our discrimination and harassment policy, we expect Artisans to treat each other with dignity and respect, free from discriminatory practices, harassment, and bullying of any kind. Actions in violation of our policy will not be tolerated. This policy extends to all employees, vendors, suppliers, contractors, consultants, and customers.

Our culture was founded on mutual respect for one another and is one of our most valuable assets. We expect our work environment to be safe, civil, and inclusive. Everyone should be treated with the utmost respect, no matter their role at the company. We do not tolerate bullying, and we encourage you to immediately report bullying incidents.

It is unlawful to harass someone on the basis of a protected class. What are examples of protected classes?

Depending on where you live, protected classes may include race, creed, color, religion (including religious dress and grooming practices), sex, gender identity, gender expression, sexual orientation, national origin, ancestry, age, marital status, military or veteran status, genetic information, or any physical or mental disability, whether actual or perceived, taking protected leaves (e.g., maternity leave, parental leave, sick leave, disability leave, etc.), pregnancy, childbirth, or other related medical conditions.

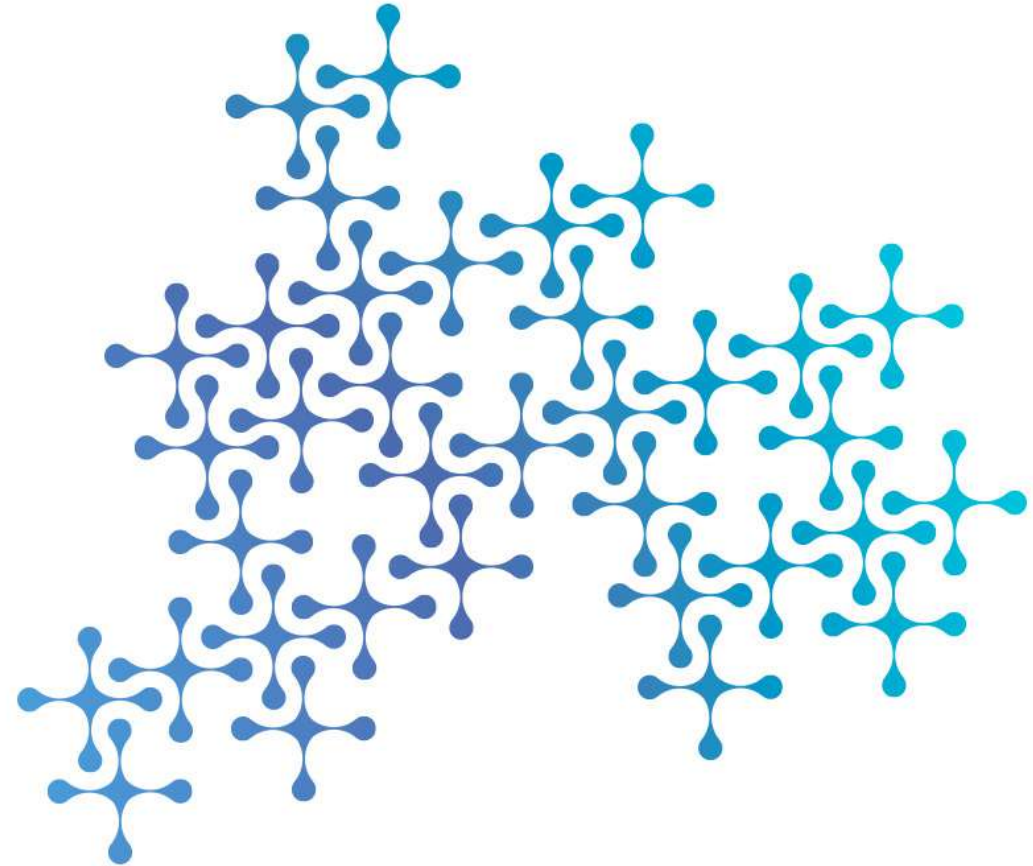
Don't be rude.

Examples of prohibited bullying could include: screaming; name calling; stealing; using threatening, intimidating, or cruel behaviours;

It's Called "The Law" for a Reason

Our success depends on operating within legal requirements and cooperating with local, national and international authorities. We expect you to understand the laws, rules and regulations applicable to Artefaktum and your areas of responsibility. If you have a question or need advice about legal compliance, seek answers from your manager, Artefaktum Legal, or our Compliance Officer.

Disregard for the law will not be tolerated, and violations of domestic or foreign laws, rules and regulations may subject you, as well as Artefaktum, to civil and/or criminal penalties. Conduct and records, including emails, are subject to internal and external audits and to discovery by third parties in the event of a government investigation or litigation. It's in everyone's best interests to know and comply with our legal obligations.



International Business Laws

We expect you to comply with the applicable laws in all countries where you travel, operate, export to, and otherwise do business, including laws prohibiting bribery, corruption, or the conduct of business with specified individuals, companies, or countries. If local customs or practices conflict with applicable laws, you should always follow the law.

In addition to complying with foreign laws, you must comply with U.S. laws, rules, and regulations governing the conduct of business outside the U.S. These include:

- Anti-corruption and anti-bribery laws, which prohibit directly or indirectly giving anything of value to a government official to obtain or retain business or favourable treatment and require maintenance of accurate company records. In other words, don't offer or accept a bribe or kickback in any form. For more information, please see our anti-corruption policy;
- Sanctions and embargoes, which generally prohibit doing business with countries subject to sanctions imposed by the U.S. government, as well as specific companies and individuals identified by the government;

- Export controls, which restrict exports from the U.S. and re-exports from other countries of goods, software and technology, and prohibit certain transfers to denied persons and entities; and

- Anti-boycott regulations, which may prohibit any action that has the effect of supporting a restrictive trade practice or boycott imposed by a foreign country.

If you question whether an activity is restricted or prohibited, check with Artefaktum Legal or our Compliance Officer before taking any action, including giving any verbal assurances that may be limited by international laws.

What are examples of items of value subject to anti-corruption and anti-bribery laws?

Some are obvious, like cash payments (sometimes under the guise of "consulting fees" or "commissions" or "marketing promos" given through intermediaries), fancy cars, and expensive watches. Less obvious examples are lavish meals, entertainment, electronics, or charitable contributions. That said, items of nominal value, such as cab fare, reasonable meal and promotional company schwag are okay.

When in doubt, double check.

Insider Trading

If you have access to confidential (or “inside”) information, you are not permitted to use or share that information for stock trading purposes or for any other purpose except to conduct Artefaktum business. All non-public information about Artefaktum (or companies with which we do business) is considered confidential information. To use material non-public information in connection with buying or selling stock, including “tipping” others who might make an investment decision on the basis of this information is both unethical and illegal. Please refer to our insider trading policy for more information.



Conflicts of Interest

Conflicts of interest are prohibited. We expect you to avoid influences that conflict with the interests of Artefaktum or might deprive Artefaktum of your undivided loyalty in Artefaktum's business dealings. Transparency is key and even the appearance of a conflict of interest can be damaging and should be avoided.

If you have questions about a potential conflict or if you become aware of an actual or potential conflict, and you are not an officer or on the Artefaktum board of directors, you should discuss the matter with your manager or our Compliance Officer.

Managers must seek the approval of our Compliance Officer after submitting a detailed written description of the proposed activity.

EVALUATING A POTENTIAL CONFLICT OF INTEREST

Factors that should be considered in evaluating a potential conflict of interest are, among others:

any potential adverse or beneficial impact on our business, or relationships with a customer, vendor or other business partner of Artefaktum;

the nature of Artefaktum confidential information to which the employee has access;

the extent to which it would result in direct or indirect benefit to the employee or a customer, vendor or business partner of Artefaktum;

the impact on the performance, responsibilities or morale of the employee or others at Artefaktum;

whether it would enhance or support a competitor's position; and

the extent to which it would appear improper to an outside observer.

Conflicts of Interest

The following are examples of situations that may, depending on the facts and circumstances, involve problematic conflicts of interests:

- **Outside Activities.** Consulting or employment with a competitor, customer, vendor or other business partner of Artefaktum (including moonlighting without permission).
- **Board or Advisory Roles.** Serving on a board or as an advisor for a competitor, customer, vendor or other business partner of Artefaktum.
- **Financial Investments.** Owning, directly or indirectly, a significant interest in any entity that does business, seeks to do business or competes with Artefaktum.
- **Use of Artefaktum Property.** Using Artefaktum property, facilities, services, information, opportunities, relationships, or position for personal gain.
- **Personal Relationships.** Conducting Artefaktum business with a family member or a business in which you have an interest, or managing a family member at Artefaktum.

While we don't encourage intra-office romance, we recognise that Artisans may become romantically involved with colleagues. However, employees must ensure that the relationship doesn't negatively impact the work environment, nor create an actual or apparent conflict, and that there are no relationships between a manager and a subordinate, or between an employee that is responsible for determining the success of another employee, such as a business partner in another function.

Depending on the circumstances, intra-office relationships may require changes to work arrangements, including reporting structure, organisational changes, or separation from employment.

Gifts and Entertainment

Business gifts and entertainment are meant to create goodwill and sound working relationships—not to gain an improper advantage with customers or facilitate approvals from government officials. The exchange, as a normal business courtesy, of meals or entertainment (such as tickets to a game or a round of golf with our employees) is a common and acceptable practice. But an extravagant gift can pressure the recipient to “return the favour” or feel in the giver’s debt, which can lead to a conflict of interest.

Unless express permission is received from a manager, our Compliance Officer, or the Audit Committee, gifts and entertainment cannot be offered, provided, or accepted by any employee unless consistent with customary business practices. Additionally, gifts and entertainment cannot:

- be of excessive monetary value;
- be simply cash;
- create the appearance of a bribe or kickback;
- be given or received on a regular or frequent basis; or
- violate any laws.

Our customers and partners often have their own gift restriction policies—so please don’t create an awkward situation where a gift has to be declined.

These principles apply to our transactions everywhere in the world, even where a practice is widely considered “a way of doing business.” Employees shouldn’t accept gifts or entertainment that could reasonably be deemed to affect their judgment or actions in the performance of their duties. Our customers, suppliers, and the public at large should be confident that our employees’ judgment is not for sale.

Under some statutes, such as the U.S. Foreign Corrupt Practices Act, giving anything of value to a government official to obtain or retain business or favorable treatment is a criminal act subject to prosecution and conviction. Discuss with your manager or our Compliance Officer any proposed entertainment or gifts if you are uncertain about their appropriateness.

Permissible gifts

- An offer to go to lunch with a customer
- Giving a Artefaktum-branded t-shirt to a customer
- A round of golf with a supplier

Prohibited Gifts

- Offering a paid weekend golf getaway to a customer
- Receipt of field level football tickets for you and your family paid for by a supplier not in attendance
- Expensive jewellery

Antitrust and Competition

We strive to outperform our competition fairly and honestly and in compliance with antitrust and competition laws. Those laws protect consumers by prohibiting unethical or illegal business practices that restrict free competition. These laws generally prohibit agreements with a competitor or reseller, or activities designed to:

- set a price at which products or services will be sold (price fixing);
- apportion customers or territories (market division);
- designate who will submit the winning bid in a competitive bidding process (bid rigging); and
- require a partner to sell Artefaktum services at or above a particular price (resale price maintenance).

There are severe penalties for certain types of violations, including criminal penalties and potential fines and damages of millions of dollars—which can be tripled under certain circumstances. Understanding the antitrust requirements and unfair competition laws of the various jurisdictions where we do business can be difficult, and we encourage you to seek assistance from your manager, Artefaktum Legal or our Compliance Officer whenever you have a question relating to these laws.

Some kinds of information, such as pricing, used technologies and inventory, should not be exchanged with competitors, regardless of how innocent or casual the exchange or setting may be.

Fair Dealing and a Level Playing Field

We strive to outperform our competition fairly and honestly. Advantages over competitors are to be based on the superior performance of our products and services, not unethical or illegal business practices. Acquiring proprietary information through improper means, possessing trade secret information that was improperly obtained, or inducing improper disclosure of confidential information from past or present employees of other companies is prohibited, even if motivated by an intention to advance Artefaktum's interests. If you obtain information that may constitute a trade secret or other confidential information of another business by mistake, or if you have any questions about the legality of the information gathering, consult your manager or our Compliance Officer.

Deal fairly with our customers, suppliers, employees and anyone else with whom you have contact in the course of performing your job.

The U.S. Federal Trade Commission Act provides that “unfair methods of competition in commerce, and unfair or deceptive acts or practices in commerce, are declared unlawful.” It is a violation of this Act to engage in deceptive, unfair or unethical practices and to make misrepresentations in connection with sales activities.

If you're involved in procurement, you have a special responsibility to adhere to principles of fair competition in the purchase of products and services by selecting suppliers based exclusively on normal commercial considerations, such as quality, cost, availability, service and reputation, and not on the receipt of personal favours.

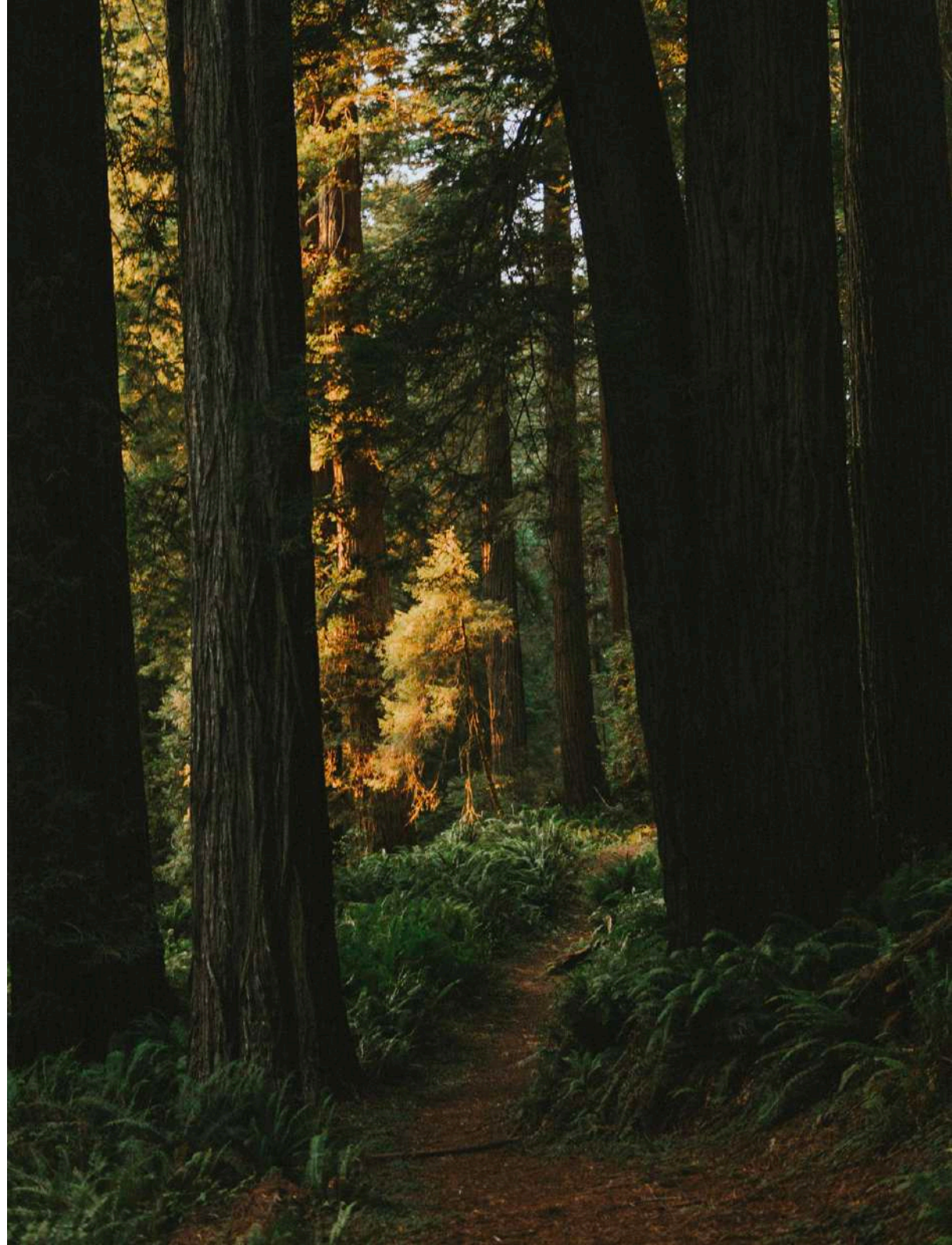
Human Rights— Non-Negotiable

We are committed to corporate, social, and environmental responsibility, including ensuring our employees and suppliers take appropriate measures to mitigate the risk of unsafe working conditions, human trafficking, conflict minerals, and slavery within our global supply chain.

We do not tolerate forced, indentured, involuntary, or child labor. Nor do we tolerate human trafficking by any Artefaktum supplier for any purpose.

Environmental Responsibility

We are committed to conducting our business in an environmentally responsible manner. We expect you to comply with all applicable environmental laws and work to minimize and, if practicable, eliminate the use of any substance or material that may cause environmental damage, reduce waste generation and dispose of all waste through safe and responsible methods.



Accurate Records and Financial Reporting

Our corporate and business records should be completed accurately and honestly, as the integrity of our records and public disclosure depends upon the validity, accuracy and completeness of these records. Intentionally making false or misleading entries, whether they relate to financial results or test results, is strictly prohibited. For example, you must ensure you submit accurate expense reimbursements and ensure all commitments are appropriately reflected in our contracts and financial systems. Our records serve as a basis for managing our business and are important in meeting our obligations to customers, suppliers, creditors, employees and others with whom we do business. So, it's important our records and accounts accurately and fairly reflect, in reasonable detail, our assets, liabilities, revenues, costs, and expenses, as well as all transactions and changes in assets and liabilities.

We require that:

- no entry be made in our books and records that intentionally hides or disguises the nature of any transaction or of any of our liabilities or misclassifies any transactions as to accounts or accounting periods;
- transactions be supported by appropriate documentation;
- the terms of sales and other commercial transactions be reflected accurately in the documentation for those transactions and all such documentation be reflected accurately in our books and records;
- employees comply with our system of internal controls; and
- no cash or other assets be maintained for any purpose in any unrecorded or “off-the-books” fund.

Our accounting records are also relied upon to produce reports for our management, stockholders and creditors, as well as for governmental agencies, including the U.S. Internal Revenue Service (IRS). All employees must cooperate fully with Artefaktum Finance, as well as our independent public accountants and counsel, respond to their questions with candor and provide them with complete and accurate information to help ensure that our books and records, as well as our reports filed, are accurate and complete.

Failing to act in Reporting

In addition, no employee, director or person acting under their direction may knowingly:

- take any action that would intentionally cause our financial records or financial disclosure to fail to comply with generally accepted accounting principles or other applicable laws, rules and regulations;
- coerce, manipulate, mislead or fraudulently influence Finance, our independent public accountants, or our counsel, in a manner that could render our financial statements materially misleading; or
- make or encourage any other person to make any false or misleading statement in any of our reports

If you learn of any departure from these standards, you have a responsibility to report your knowledge promptly to a manager, our Compliance Officer, the Audit Committee of Artefaktum's board of directors or one of the other compliance resources or in accordance with the provisions of Artefaktum's speak up policy on reporting complaints regarding accounting and auditing matters.



Artefaktum is a safe place

We are committed to a violence-free work environment, and we don't tolerate any level of violence or the threat of violence in the workplace. Under no circumstances should you bring a weapon to work, a customer site, or any other off-site location where Artefaktum business is conducted. The only exception are the OPS and CP teams. In case of potential violence or danger, immediately contact local law enforcement and report it to your manager, Human Resources, or Artefaktum Legal.

Artefaktum is a Healthy Place

The health and safety of our employees are paramount. We trust our employees to exercise prudent judgment when it comes to consuming alcohol. You represent Artefaktum—whether in the office, at an after-hours work activity, an offsite, or Artefaktum-sponsored event. Never drink to the point of impairment, inappropriate behavior, or in a way that endangers the safety of others. If you are impaired, Artefaktum can assist you in arranging transportation or accommodations.



! No drugs. Period!

We also expect all employees to comply with applicable federal, state and local laws regarding drugs if engaged in Artefaktum business. You may never engage in the unlawful manufacture, distribution, dispensing, possession, sale, or use of a controlled substance in the workplace. While the authorized use of marijuana may be permissible in some locations in which we operate, as a matter of U.S. federal law, state-authorized marijuana is not considered by Artefaktum to be legitimate drug use. Additionally, as a U.S. government contractor, Artefaktum cannot accommodate the medical use of marijuana where doing so conflicts with applicable law and/or our obligations to provide a drugfree workplace.

Protection and Proper Use of Artefaktum Assets

Use of Artefaktum's equipment and facilities Protect our assets and ensure their efficient use. Theft, carelessness and waste have a direct impact on our profitability. Artefaktum assets, such as cash, office supplies, computer equipment, services, facilities, and buildings, are expected to be used only for legitimate business purposes, although incidental personal use may be permissible. Food and beverages provided by Artefaktum are intended as a benefit during hours of service to Artefaktum. You may not use our corporate name, any brand name or trademark owned or associated with Artefaktum or any letterhead stationery for any personal purpose. If you're not sure if a certain use of Artefaktum assets is allowed, contact your manager.

IT Security

All data residing on or transmitted through Artefaktum's information resources, including email, documents, and intellectual property is the property of Artefaktum or its customers and partners, and subject to inspection, retention and review by Artefaktum, with or without an employee's or third party's knowledge, consent or approval, in accordance with applicable law and the

investigations policy. Any misuse or suspected misuse of our assets must be immediately reported to your manager or our Compliance Officer.

If you receive authorization to access another entity's internal computer system or other resources, you must make a permanent record of that authorization for future reference, and you may not exceed the scope of that authorization. Spam is regulated by laws of various jurisdictions. If you intend to send unsolicited communications, contact your manager, Artefaktum Legal or our Compliance Officer for prior approval. For further information on this topic, please review the internal Artefaktum Storage information security policy.

Security

We are each responsible for observing good security practices and are expected to report any breach of security or suspicious behavior. Safeguard your passwords and any information or hardware that is assigned to you. Observe a clean-desk policy and lock your computer screen when you leave your work area. Watch for "tailgaters" entering Artefaktum premises behind you. **Report any suspicious activity to Artefaktum Facilities immediately.**

Protection and Proper Use of Artefaktum Assets

Intellectual Property and Confidential Information

Artefaktum respects the intellectual property rights of others and expects the same in return. Next to our employees, intellectual property (e.g. patent, trademark, copyright and trade secret) is one of our greatest assets, and it's up to every Artisan to help protect it.

Respecting Intellectual Property Rights

We expect you to respect all patent, trademark and copyright laws and use Artefaktum's intellectual property in accordance with all Artefaktum policies or guidelines. If you're developing a product or collateral that uses content that doesn't belong to Artefaktum, check with Artefaktum Legal first.

Trade Secrets and Confidential Information

As an employee of Artefaktum, you may learn of information about Artefaktum that is confidential and proprietary. You also may learn of information before it is released to the general public. We expect that you keep Artefaktum's information confidential, as unauthorized use or disclosure of Artefaktum's intellectual property or other confidential information can lead to their loss to competitors or serious loss of value.

In addition, there may be times when you learn confidential information about other companies before that information has been made available to the public.

You must treat this information in the same manner as you are required to treat Artefaktum's confidential and proprietary information. There may even be times when you must treat as confidential the fact that we have an interest in, or are involved with, another company.

We expect you to keep confidential and proprietary information confidential unless and until that information is released to the public through approved channels (usually through a press release, an SEC filing or a formal communication from a member of senior management).

You must refrain from discussing confidential or proprietary information with outsiders and even with other employees of Artefaktum, unless those fellow employees have a legitimate need to know the information in order to perform their job duties. Unauthorized use or distribution of this information could be illegal and result in civil liability and/or criminal penalties.

What's confidential? The Artefaktum Way

Confidential information includes non-public information that might be of use to competitors or harmful to Artefaktum or its customers if disclosed, such as business plans, technologies used, technical strategies, financial information, information related to Artefaktum's products, data and results, inventions, works of authorship, trade secrets, software, patents, patent applications, licenses, suppliers, manufacturers, customers, market data, personnel data, personally identifiable information pertaining to our employees, customers or other individuals (including, for example, names, addresses, telephone numbers and social security numbers), and similar types of information provided to us by our customers, suppliers and partners.

This information may be protected by patent, trademark, copyright and trade secret laws.

You should also take care not to inadvertently disclose confidential information. Devices and materials that contain confidential information should be stored securely. Unauthorized posting or discussion of confidential information concerning our business, information or prospects on the Internet is prohibited. Be cautious when

discussing sensitive information in public places like elevators, airports, restaurants and "quasi-public" areas in and around our place of business. All Artefaktum emails, voicemails and other communications are presumed confidential and should not be forwarded or otherwise disseminated outside of Artefaktum except where required for legitimate business purposes and only with appropriate confidentiality markings.

In addition to the above responsibilities, if you are handling information protected by any privacy policy published by us, such as our website privacy policy, then you must handle that information in accordance with the applicable policy.

Open Source

We support open source software development, however, when working with open source software, we comply with the license requirements that the software is being distributed under. Failing to comply with certain licensing restrictions may lead to significant legal claims against Artefaktum. Please make sure you run all open source software by Artefaktum Legal before you use it in any Artefaktum product, feature or internal project.

You may not, while acting on behalf of Artefaktum or while using Artefaktum's information resources:

- remove or alter any installed security or management mechanisms;
- access the internal computer system or other resource of another entity without express written authorization from the entity responsible for operating that resource (aka hacking);
- intentionally introduce any vulnerability or malicious code (e.g., backdoor, virus, trojan, or exploit) into any Artefaktum system or product; or
- commit any unlawful or illegal act, including harassment, libel, fraud, sending of unsolicited bulk email (aka spam) or material of objectionable content in violation of applicable law, trafficking in contraband of any kind or any kind of espionage.

When in doubt, check with Corporate Security or your manager.

Security breaches will be reported to our strategic law enforcement partners and may lead to termination of work contract

Media/Public Discussions

We will disclose material information concerning Artefaktum to the public only through specifically designated channels to avoid inappropriate publicity and to ensure that all those with an interest in Artefaktum will have equal access to information. All inquiries or calls from the media, financial and industry analysts should be referred to Artefaktum's General Counsel or VP of Global Communications.

We have designated our CISO, COO and President as our official spokespersons for financial matters.

We have designated official spokespersons for nonfinancial information about Artefaktum. Unless a specific exception has been made, seek approval from Artefaktum's General Counsel or VP of Global Communications before communicating with the media, financial and technology analysts on behalf of Artefaktum.

You also may not provide any information to the media about us off the record, for background, confidentially or secretly.



Compliance Standards and Procedures

To facilitate compliance with this Code, we have implemented a program of Code awareness, training and review. We have appointed our Compliance Officer to oversee this program.

In addition to fielding questions or concerns about potential violations of this Code, our Compliance Officer is responsible for:

- investigating possible violations of this Code;
- training new employees in Code policies;
- conducting training sessions to refresh employees' familiarity with this Code;
- distributing copies of this Code annually to each employee with a reminder that each employee is responsible for reading, understanding and complying with this Code;
- updating this Code as needed and alerting employees to any updates, with approval of our Board

of Directors, as appropriate, to reflect changes in the law, company operations and recognised best practices, and to reflect Artefaktum's experience; and

- otherwise promoting an atmosphere of responsible and ethical conduct.

Your most immediate resource for any matter related to this Code is your manager. Your manager may have the information you need or may be able to refer the question to another appropriate source. In situations where you prefer not to go to your manager, you should discuss your concern with our Compliance Officer. If you are uncomfortable speaking with your manager or our Compliance Officer, please contact our CFO, CFO or CEO.

Obtaining Help

When you have concerns or questions, please contact one of the following resources:

- Your manager;
- Human Resources;
- Artefaktum Legal
- Artefaktum's Compliance Officer
- call 1-617-861-9250.

artefaktum.

ABOUT ARTEFAKTUM LLC.,

By collecting, structuring, and analysing data from a broad base of sources including observations, Artefaktum turns large amounts of data into actionable insights, and deliver the most complete, accurate, and timely intelligence available. With its headquarter in Boston, MA, Artefaktum provides intelligence to enable transactions in unfamiliar markets and with new business partners. Artefaktum investigates large complex fraud cases, unusual threats or suspected corporate wrongdoing, provides, OSINT, Research, Asset Tracing, cyber security and risk management professional services for Government Agencies, Law Enforcement, the closed community of global exposed (U) HighNet Worth Individuals and their families or Family Office clients, international or specialised law offices, financial institutions and the industry.

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