

# LocknCharge Code of Conduct

At LocknCharge (“LNC”), we are committed to conducting our business activities with honesty, integrity and the highest level of ethical standards which are encapsulated in our EPIC Values. Our EPIC Values (Excellence|Positivity|Integrity|Collaboration) are the reason why LNC has an established level of trust with Customers, Employees, Partners, Stakeholders, and Communities. We expect all parties who engage with LNC to conduct themselves with the highest standards of honesty, fairness and integrity; operate in full compliance with all applicable laws and regulations; and to adhere to the principles outlined in this Code of Conduct. This Code sets out the standards of behavior we expect our Customers, Employees, Partners and Stakeholders to hold while conducting business with and on behalf of LocknCharge.

As used in this Partner Code of Conduct, “We” refers collectively to LNC, Employees, Partners and Stakeholders.



## Integrity and Ethics

**We will operate our business with the highest standards of integrity, in compliance with all laws and regulations, and consistent with the principles outlined below:**

**Anti-Corruption:** We will comply with all applicable anti-corruption and anti-money laundering laws. LNC does not tolerate payments of bribes, kickbacks or extortion of any kind, whether in dealings with government employees or individuals in the private sector.

**Gifts & Entertainment:** We will not provide or accept business gifts, entertainment or anything of value to or from any person or organization that is intended to improperly influence or reward an action or decision.

**Fair Competition:** We will compete fairly and honestly for business. LNC prohibits any type of action or agreement to fix prices, divide markets or engage in any other anti-competitive practices.

**Confidential Information:** We will maintain the confidentiality and security of sensitive information of our customers, suppliers and business partners. We will respect intellectual property rights, protect confidential information, and comply with privacy rules and regulations.

**Data Protection & Privacy:** We will only collect and use personal information as needed and in compliance with all relevant data protection and privacy laws. We will maintain suitable IT and management controls to ensure personal information is properly secured and controlled.

**Government Customers:** We will live up to the additional legal and regulatory requirements related to transactions with government customers.

**Conflicts of Interest:** We will maintain a partnership free of conflicts of interest. Should such a situation arise between our companies or any of our employees, LNC asks that you report all pertinent details to LNC. Conflicts of interest include, but are not limited to, close personal/family relationships or the giving or receiving of lavish business courtesies.

**Trade Compliance:** We will conduct global business in strict compliance with applicable international trade laws.

**Competition (Anti-Trust Laws):** We will take all reasonable steps necessary to ensure that we are fully compliant with all applicable competition (also known as anti-trust) laws.

**Insider Trading:** Our interactions may result in access to material, nonpublic information about LNC, or another company (including LNC’s customers, suppliers and other business partners). We will not engage in any action to take advantage of that information or share that information with others.

**Marketing Practices:** Our advertising and marketing activities will be conducted truthfully, accurately and in accordance with applicable laws, rules and regulations. LNC partners must ensure that all communications to its customers will be truthful, accurate and not misleading.

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## Human Rights, Labor Laws and Fair Labor Practices

We will provide a safe and healthy work environment, fully compliant with all employment, environmental, health and safety laws with a commitment to inclusion, diversity and equal opportunity employment.

We will maintain a work environment and supply chain that is free from human trafficking, slavery and unlawful child labor.

Where national laws do not provide suitable protection, human rights standards must be observed.

We will not discriminate on the basis of race, color, religion, national origin, gender, sexual orientation, gender identity, disability, age, veteran status or any other characteristic protected by law.



## Professional Conduct

We will maintain an inclusive, productive, respectful and professional environment, free from any forms of discrimination or harassment.

LNC will not tolerate any form of discrimination or harassment.

We will behave in a professional manner at any event sponsored or co-sponsored by LNC and/or where LNC employees are in attendance, including responsible alcohol use and continued adherence to this Code of Conduct.



## Reporting Concerns or Questionable Behavior

LNC's reputation for honesty, integrity, and fair dealing has been earned through the efforts of our employees over many years and is one of LNC's most valuable assets. It only takes one misguided or inappropriate action to put this reputation at risk. If an Employee, Partner, or Stakeholder suspects LNC's reputation is at risk or believes there is a violation of this Code of Conduct, please report the concern directly to [ethicsviolation@lockncharge.com](mailto:ethicsviolation@lockncharge.com).

[www.lockncharge.com/code-of-conduct](http://www.lockncharge.com/code-of-conduct)

(888) 943-6803

[ethicsviolation@lockncharge.com](mailto:ethicsviolation@lockncharge.com)

