

Code of Conduct:

A letter from our CEO

Dear Colleagues:

At Euler Products, Inc., we believe our conduct matters; it is important to always do the right thing. Living with integrity and following a clear ethical code creates a good business, a great place to work, and a trustworthy investment. That conduct transcends all areas of our business, including how we deal with each other internally and how we deal with customers, vendors, alliance partners and governments. We respect the whole person, and we celebrate exploration, transparency, design, performance, engagement, relationships, and inclusiveness because these are things that matter to us. Our Corporate Code of Conduct reflects these important core values.

Our Code of Conduct sets forth our basic ethical standards and core values that are applicable to all of us all of the time. Our Code is designed to guide us in our work activities wherever we are located. It helps guide us on how to conduct our business and directs us where to go when we have questions or concerns. As a guide, our Code of Conduct also allows us to value the diversity of cultures, people and their experiences wherever located.

All employees of Euler Products Inc. and its subsidiaries are responsible for understanding and complying with the Code of Conduct. By living our values and upholding our Code of Conduct, you will help ensure that we continue to strive to achieve the right results, the right way.

Sincerely,

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President and CEO

EULER Code of Conduct:

1. Be inclusive.

We welcome and support people of all backgrounds and identities. This includes, but is not limited to members of any sexual orientation, gender identity and expression, race, ethnicity, culture, national origin, social and economic class, educational level, color, immigration status, sex, age, size, family status, political belief, religion, and mental and physical ability.

2. Be considerate.

We all depend on each other to produce the best work we can as a company. Your decisions will affect clients and colleagues, and you should take those consequences into account when making decisions.

3. Be respectful.

We won't all agree all the time, but disagreement is no excuse for disrespectful behavior. We will all experience frustration from time to time, but we cannot allow that frustration become personal attacks. An environment where people feel uncomfortable or threatened is not a productive or creative one.

4. Choose your words carefully.

Always conduct yourself professionally. Be kind to others. Do not insult or put down others. Harassment and exclusionary behavior aren't acceptable. This includes, but is not limited to:

- Threats of violence.
- Insubordination.
- Discriminatory jokes and language.
- Sharing sexually explicit or violent material via electronic devices or other means.
- Personal insults, especially those using racist or sexist terms.
- Unwelcome sexual attention.
- Advocating for, or encouraging, any of the above behavior.

5. Don't harass.

In general, if someone asks you to stop something, then stop. When we disagree, try to understand why. Differences of opinion and disagreements are mostly unavoidable. What is important is that we resolve disagreements and differing views constructively.

6. Make differences into strengths.

We can find strength in diversity. Different people have different perspectives on issues, and that can be valuable for solving problems or generating new ideas. Being unable to understand why someone holds a viewpoint doesn't mean that they're wrong. Don't forget that we all make mistakes, and blaming each other doesn't get us anywhere. Instead, focus on resolving issues and learning from mistakes.