



WELLSTAR Code of Business Conduct and Ethics

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1. Statement of Policy

WELLSTAR Technologies Corp. (“**WELLSTAR**”) is committed to the highest standards of legal and ethical business conduct. This Code of Business Conduct and Ethics (the “**Code**”) summarizes the legal, ethical, professional, and regulatory standards that apply to WELLSTAR and the individuals who work for, represent, or act on behalf of WELLSTAR and is a reminder of the seriousness of that commitment. Compliance with this Code is mandatory for all directors, officers, employees, contractors, consultants, temporary workers, volunteers, individuals providing or delivering health care or health related services, and other persons acting for or on behalf of WELLSTAR (collectively, “**Personnel**”). WELLSTAR may also require agents, representatives, vendors, suppliers, service providers, and other third parties to comply with this Code or equivalent standards when working with or on behalf of WELLSTAR.

To help the Personnel of WELLSTAR understand what is expected of them and to carry out their responsibilities, the board of directors of WELLSTAR (the “**Board**”) has created and adopted this Code. While this Code covers a wide range of business practices and procedures, it is not intended to be a comprehensive guide to all WELLSTAR policies or to all responsibilities under applicable laws, regulations, professional obligations, contractual obligations, or stock exchange requirements on which the securities of WELLSTAR are listed. Rather, this Code sets out basic principles to help resolve the ethical, legal, and professional issues that may arise in conducting WELLSTAR business. As such, this Code functions as a guideline, or a minimum requirement, that must always be followed. If a law conflicts with a policy in this Code, Personnel must comply with the law; however, if a local custom or policy conflicts with this Code, Personnel must comply with the Code. If Personnel have any questions about these conflicts or any questions relating to the policies or application of the Code, Personnel should ask their supervisors how to handle the situation.

This Code should be read together with applicable WELLSTAR policies, including the *Employee Handbook*, *Acceptable Use Policy*, *Whistleblower Policy*, *Bribery and Corruption Policy*, *Competition Law Compliance Policy*, *Privacy Policy*, *Human Rights Policy*, *Workplace Violence, Discrimination, Bullying and Harassment Policy*, *Disclosure Policy*, *Expenditure Policy*, and *Travel and Entertainment Policy*.

Personnel are expected to read, understand, and comply with this Code and applicable WELLSTAR policies. Violations of the law, this Code, or WELLSTAR policies may lead to disciplinary action, up to and including termination of employment or service with WELLSTAR.

2. Roles and Responsibilities

Role	Responsibilities
Board and Audit and Risk Committee	• Responsible for this Code and oversee its administration and effectiveness • Oversee significant ethical, compliance, financial reporting, and whistleblower matters within their respective mandates • Review and approve waivers involving directors or executive officers • Receive escalated reports of significant violations, conflicts of interest, or control deficiencies, as appropriate
Executive Management	• Implement and administer the Code within their areas of responsibility • Provide guidance, training, and appropriate reporting channels for Personnel

	• Assess and respond to reported concerns, investigations, regulatory matters, and potential conflicts of interest • Maintain required compliance records, registrations, controls, and supporting procedures • Escalate significant matters to the Board, Audit and Risk Committee, or appropriate authority
Personnel	• Read, understand, and comply with this Code, applicable laws, and related WELLSTAR policies • Conduct WELLSTAR business honestly, ethically, and within the authority of their role • Protect WELLSTAR assets, confidential information, and accurate business records • Promptly disclose conflicts of interest and report known or suspected misconduct • Cooperate with authorized reviews, investigations, audits, and compliance activities

3. Honest and Ethical Conduct

Our business has been built with the assistance of quality employees and representatives who adhere to the very highest standards of honesty, ethics, and fairness in our dealings with all of our business contacts. We place the highest value on the integrity of the directors, our officers, and our personnel, and demand this level of integrity in all our dealings. We insist on not only ethical dealings with others, but on the ethical handling of actual or apparent conflicts of interest between personal and professional relationships.

3.1. Competition and Fair Dealing

All Personnel are required to deal honestly and fairly with our customers, suppliers, competitors, other employees and other third parties. We seek to outperform our competition fairly and honestly. Stealing proprietary information, possessing trade secret information that was obtained without the owner's consent, or inducing such disclosures by past or present employees of others is prohibited. No employee should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other intentional unfair practice. Personnel must comply with WELLSTAR's *Competition Law Compliance Policy* and consult Legal before engaging in activities that may raise competition law risk.

3.2. Conflicts of Interest and Corporate Opportunities

Personnel should not be involved in any activity that creates or gives the appearance of a conflict of interest between their personal interests and the interests of WELLSTAR. A conflict of interest occurs when an individual's private interest interferes in any way or may appear to interfere with the interests of WELLSTAR as a whole. A conflict situation can arise when a director, officer or employee takes actions or has interests that may make it difficult to perform his or her work for WELLSTAR objectively and effectively. Conflicts of interests may also arise when Personnel, or a member of their family, receives an improper personal benefit as a result of their position with WELLSTAR. Loans to, or guarantees of obligations of, Personnel and their family members may create conflicts of interest.

It may be a conflict of interest for Personnel to work simultaneously for a competitor, customer, or supplier. The best policy is to avoid any direct or indirect business connection with our customers, suppliers, or competitors, except on our behalf. In particular, except as provided below, no Personnel shall:

- i. be a consultant to, or Personnel of, or otherwise operate an outside business that:
 - 1. markets products or services that compete directly or indirectly with the current or potential products, therapies, therapeutic programs, or services developed or being developed by WELLSTAR.
 - 2. supplies products or services to WELLSTAR, or
 - 3. purchases products or services from WELLSTAR,
- ii. accept any personal loan or guarantee of obligations from WELLSTAR, except to the extent such arrangements have been approved by outside legal counsel and are legally permissible; or
- iii. conduct business on behalf of WELLSTAR that will result either directly or indirectly in personal gain.

Personnel must promptly disclose any actual, potential, or perceived conflict of interest.

Personnel should disclose conflicts to their manager, People and Culture, or Legal who shall escalate reports of perceived conflicts of interest involving executives to the Audit and Risk Committee.

With respect to officers or directors, the Board may make a determination that a particular transaction or relationship will not result in a conflict of interest covered by this Code.

With respect to all other Personnel, WELLSTAR Legal, outside legal counsel where appropriate, or the Board may make such a determination. Any waivers of this Code as to an officer or director may only be approved by the Board. If Personnel are not sure whether a potential matter constitutes a conflict of interest, please contact the Chair of our Audit and Risk Committee, who will assist Personnel in the determination.

3.3. Confidentiality

Our Personnel are entrusted with our confidential information and with the confidential information of our suppliers, customers, or other business partners. This information includes all non-public information that might be of use to competitors, or, if misused or misappropriated, harmful to WELLSTAR or its customers, and may include:

- (i) Personal Information (“PI”), Personal Health Information (“PHI”), patient information, provider information;
- (ii) technical or scientific information about current and future products, services, or research;
- (iii) security information;
- (iv) strategy, business, or marketing plans or projections;
- (v) earnings and other internal financial data;
- (vi) personnel information;

- (vii) contracts;
- (viii) product information, pricing, supply, and customer lists;
- (ix) information received from patients, clients, vendors, suppliers, business partners, or other third parties; and
- (x) other non-public information that, if disclosed, might be of use to our competitors, or harmful to our suppliers, customers, or other business partners.

This information is our property, or the property of our suppliers, customers, or business partners, and in many cases was developed at great expense.

Our Personnel must maintain the confidentiality of confidential information entrusted to them by WELLSTAR, patients, clients, suppliers, customers, providers, employees, contractors, or other business partners, except when disclosure is authorized by outside legal counsel or is otherwise required by applicable laws or regulations. Our Personnel must only collect, access, use, disclose, retain, transfer, or dispose of PI, PHI, and other confidential information when authorized, required for their duties, and permitted by applicable law and WELLSTAR policy.

Confidentiality obligations continue after employment, engagement, or professional relationship with WELLSTAR ends. Our Personnel must comply with applicable confidentiality agreements, the *Employee Handbook*, *Privacy Policy*, *Acceptable Use Policy*, *Data Classification Policy*, *Data Protection Policy*, and related privacy and security policies.

4. Record-Keeping

Honest and accurate recording and reporting of information is required of Personnel in order to make responsible business decisions. All of the books, records, accounts, and financial statements of WELLSTAR must be maintained in reasonable detail, must appropriately reflect WELLSTAR's transactions, and must conform both to applicable legal requirements and to WELLSTAR's system of internal controls.

Business expenses, invoices, time records, approvals, financial records, and supporting documentation must be accurate, complete, and recorded in accordance with WELLSTAR policies, including the *Disclosure Policy*, records retention requirements, and internal controls. If Personnel are unsure whether an expense, transaction, or record is appropriate, they must ask their manager, Finance, or Legal before proceeding.

5. Protection and Proper Use of WELLSTAR Assets

All Personnel shall protect WELLSTAR assets and use them responsibly, lawfully, efficiently, and for legitimate business purposes. WELLSTAR assets include funds, equipment, devices, systems, networks, software, data, records, intellectual property, confidential information, brands, business opportunities, and work time. Theft, fraud, carelessness, waste, unauthorized use, and misuse of WELLSTAR assets, create unacceptable risk for WELLSTAR, are prohibited and must be reported promptly. Any suspected incident of fraud or theft should be immediately reported for investigation. Equipment should not be used for non-Company business, though incidental personal use may be permitted. The law forbids persons from stealing the property of WELLSTAR, including cash, credit cards, and other tangible and intangible assets.

Personnel must use WELLSTAR technology resources in accordance with the *Acceptable Use Policy* and related information security and privacy policies. WELLSTAR's information technology system and other technology resources may be used only for legitimate business-related communications, though occasional personal use that is professional and does not interfere with WELLSTAR's business may be permitted.

All Personnel are prohibited from sharing their passwords, attempting to bypass security controls, access systems, or information without authorization, or use WELLSTAR systems for unlawful, unauthorized, discriminatory, harassing, deceptive, disruptive, or improper purposes. Personnel must abide by all security restrictions on all technology systems and resources.

Our Personnel must use artificial intelligence (“AI”) tools only in accordance with the *WELLSTAR Safe and Responsible Use of AI policy*.

The obligation to protect the assets of WELLSTAR includes its proprietary information. Proprietary information includes intellectual property such as trade secrets, patents, trademarks, and copyrights, as well as business, lists of customers, data, codes, programs, methods, processes, and procedures in connection with the development and providing of WELLSTAR's products, market research, marketing and service plans, engineering and manufacturing ideas, designs, databases, records, salary information, WELLSTAR's agreements with vendors and other third parties, financial information and projections, and other commercially sensitive information which is not readily available to the public through legitimate origins, and any unpublished financial data and reports. Unauthorized use or distribution of this information would violate the policy of WELLSTAR, could be illegal and may result in civil or even criminal penalties. The obligation to preserve confidential information continues even after employment ends. Below is a summary of the main areas of intellectual property and confidential information.

5.1. Patents

Patents are granted on inventions, such as new or improved machines, drug compounds, research discoveries, processes, workflows, computer programs, and methods of doing business. WELLSTAR strives to protect its inventions with patents, wherever possible. The inventions Personnel create in the course of their employment belong to WELLSTAR.

5.2. Trademarks

Trademarks are distinctive symbols, words or groups of words that distinguish the products or services of a particular company from those of other companies. Consistent and careful usage of all trademarks of WELLSTAR is imperative.

5.3. Copyrights

Copyrights protect original works of authorship, such as written materials, software, audio-visual works, photographs, drawings, illustrations, and similar works. An employee who creates a work in the course of their employment creates it on behalf of WELLSTAR and WELLSTAR is the exclusive owner of the copyright. All employees, as a condition of their employment and as set out in the employment agreements, are required to waive any moral rights they may have in such copyright in favour of WELLSTAR. As opposed to employees, the copyright of a work created by contractors or third-party services providers rests initially with

the author or authors of the work, therefore it is essential that all contracts with third parties or contractors secure an assignment of all intellectual property rights (and a waiver of moral rights) in favour of WELLSTAR.

5.4. Confidential Information

Confidential Information is any information that gives WELLSTAR a competitive advantage, is not generally available to the public, or could harm WELLSTAR, Personnel, patients, clients, providers, suppliers, customers, or business partners if disclosed inappropriately. Personnel must follow the WELLSTAR *Data Classification, Retention, and Protection* policies that outline the requirements for data classification, safeguarding, retention, and disposal. Personnel must not leave confidential information in places where it could be accessed by unauthorized individuals or discuss it where it could be overheard.

Personnel are prohibited from taking for themselves personal opportunities that are discovered through the use of corporate property, information, or position without the consent of the Board. No Personnel may use corporate property, information or position for improper personal gain, and no Personnel may compete with WELLSTAR directly or indirectly. Personnel owe a duty to WELLSTAR to advance its legitimate interests when the opportunity to do so arises.

6. Provide Full, Fair, Accurate, Timely and Understandable Disclosure

We are committed to providing our shareholders and investors with full, fair, accurate, timely and understandable disclosure in the reports of WELLSTAR. Personnel must take all steps available to assist WELLSTAR in these responsibilities. To this end, Personnel shall:

- not make false or misleading entries in our books and records for any reason;
- notify the Chief Financial Officer (the “CFO”) of WELLSTAR, or other person operating in such a capacity, if they become aware of an unreported or questionable transaction;
- maintain a system of internal accounting controls that will provide reasonable assurances to management that all transactions are properly recorded;
- prohibit the establishment of any undisclosed or unrecorded funds or assets;
- maintain a system of internal control over financial reporting that will provide reasonable assurances to our management that material information about WELLSTAR is made known to management, particularly during the periods in which our periodic reports are being prepared; and
- present information in a clear and orderly manner and avoid the use of unnecessary legal and financial language in the information provided to stockholders and, if applicable, our periodic reports.

Our Personnel must comply with WELLSTAR’s *Disclosure Policy, Insider Trading Policy*, securities law obligations, stock exchange requirements, internal controls, and finance policies.

7. Special Ethical Obligations for Employees with Financial Reporting Responsibilities

The Chief Executive Officer (“**CEO**”), CFO, controller, or other persons performing similar financial reporting, accounting, disclosure, or internal control functions for WELLSTAR have special responsibilities to promote integrity, accurate reporting, and compliance with applicable laws and accounting standards. Each applicable Personnel must:

- act with honesty and integrity, including the ethical handling of actual or apparent conflicts of interests between personal and professional relationships;
- comply with all applicable laws, rules, and regulations of federal, state, provincial and local governments, and other appropriate private and public regulatory agencies applicable to the performance of their duties with WELLSTAR;
- comply with the established accounting procedures, system of internal control over financial reporting of WELLSTAR and generally accepted accounting principles;
- promptly disclose to the Audit and Risk Committee any significant deficiencies in the design or operation of the internal control over financial reporting of WELLSTAR impacting the collection and reporting of financial data and any fraud involving management or other Personnel who play a significant role in the internal control over financial reporting of WELLSTAR; and
- provide information that is accurate, complete, objective, relevant, timely and understandable to ensure full, fair, accurate, timely and understandable disclosure in reports and documents that WELLSTAR files with, or submits to, stock exchanges, securities commissions or governmental agencies, and in other public communications made by WELLSTAR.

8. Compliance with all Laws, Rules, and Regulations

WELLSTAR is committed to full compliance with the laws, regulations, professional obligations, contractual obligations, and stock exchange requirements that apply in the jurisdictions where it operates. Our Personnel are required to obey the law and comply with WELLSTAR policies. Specifically, Personnel are committed to:

- maintaining a safe and healthy work environment and complying with all applicable safety and health laws. As appropriate, WELLSTAR will develop, implement, review and update programs designed to comply with the applicable occupational health and safety legislation standards;
- promoting a workplace that is free from discrimination, harassment, bullying, workplace violence, and retaliation, including conduct based on race, colour, ancestry, place of origin, religion, marital status, family status, disability, sex, sexual orientation, age, gender identity or expression, and any other ground protected by applicable law;
- protecting PI, PHI, patient information, employee information, and other confidential information in accordance with applicable privacy and health information laws, contractual obligations, the *Privacy Policy*, *Acceptable Use Policy*, and related privacy and security policies;

- prohibiting bribes, kickbacks, facilitation payments, illegal payments, improper gifts or gratuities, and any other improper advantage, including in dealings with public officials, government entities, vendors, suppliers, customers, patients, clients, and business partners, in accordance with the *Bribery and Corruption Policy*;
- supporting fair competition and compliance with competition and antitrust laws including the *Competition Law Compliance Policy*;
- encouraging good faith reporting of concerns and prohibiting retaliation against anyone who reports a concern, seeks guidance, participates in an investigation, refuses to engage in misconduct, or exercises a legal right;
- conducting our activities in full compliance with all applicable environmental laws;
- prohibiting any illegal payments, gifts or gratuities to any government or government employee. All Personnel shall refer to WELLSTAR's policies regarding guidelines on the receipt or acceptance of gifts, entertainment or other items from vendors, customers, and business partners;
- prohibiting the unauthorized use, reproduction, or distribution of any third party's trade secrets, copyrighted information, or confidential information; and
- complying with all applicable securities laws and applicable rules and guidelines of any stock exchange on which the securities of WELLSTAR are listed.

9. Government and Third-Party Investigations

WELLSTAR may be subjected to information requests, inspections or investigations by governmental entities or private, third-party litigants. The policy of WELLSTAR is to cooperate fully with all legal and reasonable information requests, inspections or investigations, but the CEO, CFO, Legal or other persons performing similar functions for WELLSTAR (collectively, the "**Executive Officers**") are responsible for determining how WELLSTAR will respond to such actions. Individual Personnel are not authorized to respond to such actions without first consulting with an Executive Officer.

All Personnel should notify an Executive Officer or the VP Legal immediately about any governmental or third-party information request, inspection, investigation, search warrant or subpoena of WELLSTAR or its personnel or customers. All Personnel should notify an Executive Officer or the VP Legal immediately about any information request, inspection or investigation by any stock exchange or self-regulatory organization that is directed to WELLSTAR or its Personnel before any information is given to the entity.

Personnel must not destroy, alter, conceal, backdate, falsify, remove, or improperly withhold records or information relevant to an actual or anticipated investigation, audit, litigation, regulatory inquiry, or legal hold.

10. Political Activities

All Personnel shall comply with all applicable local, provincial, and federal laws regulating contributions to political candidates, campaigns and parties and lobbying activities.

All Personnel are prohibited from making any contribution in WELLSTAR's name to any local, provincial, or federal political candidate, campaign, or party. A personal contribution to a

political candidate does not violate this policy. Visits to WELLSTAR by political figures for proper business purposes does not violate this policy. Personnel should obtain written approval of an Executive Officer before establishing any provincial or federal political action committee.

WELLSTAR in no way seeks to discourage any person from participating on an individual basis in political activities on the person's own time. No Personnel, however, may use WELLSTAR's name in connection with individual political activities, except if the person is required by law to identify where he or she is employed in connection with a permitted transaction.

Political, charitable, community, lobbying, sponsorship, and donation activities must not be used to obtain an improper business advantage, influence a decision improperly, conceal a bribe, or create a conflict of interest. All Personnel must comply with the *Bribery and Corruption Policy* and any applicable approval processes.

10.1. Lobbying and Government Engagement

Personnel who communicate with government or public officials on behalf of WELLSTAR must comply with applicable federal, provincial, territorial, and municipal lobbying laws. Before undertaking any activity that may constitute lobbying, directly or through a third party, Personnel must notify the Director of Government Relations and provide the information required to assess, register, and report the activity.

WELLSTAR will maintain an internal lobbying and government-engagement log. The Director of Government Relations will administer the log and coordinate required registrations and reporting¹ in consultation with the Head of Public Sector and the WELLSTAR Legal Team. Personnel must not independently submit a lobbying registration on behalf of WELLSTAR unless authorized to do so.

Personnel must accurately and promptly report their lobbying activities, including the jurisdictions, public officials, subject matter, and time involved, and must cooperate with applicable recordkeeping and reporting requirements.

11. Money Laundering

WELLSTAR takes a strong stance against the practice of money laundering and takes all reasonable measures to prevent its services from being used for illegal purposes. If there is any concern about the reputation, integrity, or source of funds of a customer or business associate, WELLSTAR will not conduct business with that person or business.

12. Compliance Procedures, Reporting Violations, and Effect of Violations

Compliance with this Code, first and foremost, is the individual responsibility of every Personnel of WELLSTAR. We attempt to foster a work environment in which ethical issues and concerns may be raised and discussed with supervisors or with others without the fear of retribution. It is our responsibility to provide a system of reporting and access when Personnel wish to report a suspected violation, or to seek counseling, and the normal chain of command cannot, for whatever reason, be used.

¹ For federal lobbying, WELLSTAR will assess whether regulated communications by its Personnel collectively meet the registration threshold established under the federal Lobbying Act, currently eight hours in a consecutive four-week period.

12.1. Administration

Our Board and Audit and Risk Committee have established the standards of business conduct contained in this Code and oversee compliance with this Code. This Code will be included in the orientation of new employees and provided to existing Personnel on an on-going basis.

12.2. Reporting Violations and Questions

Personnel must promptly report any known or suspected violations of laws, governmental regulations, professional obligations, this Code, or WELLSTAR policies in accordance with the *Whistleblower Policy*. Certain matters may require immediate escalation, including privacy or security incidents, patient safety concerns, workplace violence, harassment or discrimination, bribery or corruption, competition law concerns, financial misreporting, fraud, or regulator contact.

12.3. No Retaliation

WELLSTAR will not allow any retaliation against any person who acts in good faith in reporting any violation. All reports will be treated confidentially to every extent possible.

12.4. Internal Investigation

When an alleged violation of the Code is reported, Personnel shall take prompt and appropriate action in accordance with the law and regulations otherwise consistent with good business practices. If the suspected violation appears to involve either a possible violation of law or an issue of significant corporate interest, or if the report involves a complaint or concern of any person, whether a member of the Personnel, a stockholder or other interested person regarding WELLSTAR's financial disclosure, internal accounting controls, questionable auditing or accounting matters or practices or other issues relating to our accounting or auditing, then the investigator should immediately report this to WELLSTAR in accordance with the *Whistleblower Policy* or notify the Chair of the Audit and Risk Committee. Additionally, if a suspected violation involves any director or executive officer or if the suspected violation concerns any fraud, whether or not material, involving management or other Personnel who have a significant role in WELLSTAR's internal controls, the investigator, or any person who received such report should immediately report the alleged violation to WELLSTAR in accordance with the *Whistleblower Policy* or to the Chair of the Audit and Risk Committee. The matter will be escalated to the appropriate level, such as the Chair of the Audit and Risk Committee or outside legal counsel, who shall assess the situation and determine the appropriate course of action. At a point in the process consistent with the need not to compromise the investigation, a person who is suspected of a violation shall be apprised of the alleged violation and shall have an opportunity to provide a response to the investigator.

12.5. Retention of Reports and Complaints

Reports, complaints, and investigation records will be retained in accordance with the *Whistleblower Policy*, records retention requirements, and applicable law.

12.6. Consequences of a Violation

Personnel who violate any laws, governmental regulations, this Code, or WELLSTAR policy will face appropriate, case specific disciplinary action, which may include demotion or immediate discharge.

13. Waivers

Waivers of any provision of this Code will only be granted in exceptional circumstances. Any waiver of this Code for executive officers or directors may be made only by the Board and will be promptly disclosed as required by any applicable law or applicable rules and guidelines of any stock exchange on which the securities of WELLSTAR are listed.

14. Related Documentation

This Code should be read together with applicable WELLSTAR policies:

- 002-POL WELLSTAR Acceptable Use Policy
- 011-POL WELLSTAR Data Classification Policy
- 012-POL WELLSTAR Data Protection Policy
- 013-POL WELLSTAR Data Retention Policy
- 021-POL WELLSTAR Privacy Policy
- 027-POL WELLSTAR Safe and Responsible Use of AI Policy
- WELLSTAR Whistleblower Policy
- WELLSTAR Insider Trading Policy
- WELLSTAR Disclosure Policy
- WELLSTAR Bribery and Corruption Policy
- WELLSTAR Human Rights Policy
- WELLSTAR Competition Law Compliance Policy
- WELLSTAR Employee Handbook
- WELLSTAR Workplace Violence Discrimination, Bullying and Harassment Policy
- WELLSTAR Expenditure Policy
- WELLSTAR Travel and Entertainment Policy

and other policies, procedures, standards, or contractual obligations applicable to a Personnel member's role.

15. Compliance

15.1. Non-Compliance with this Policy

Non-compliance with this policy is subject to disciplinary action, up to and including termination of employment and/or contract, as well as any other remedies as legally applicable depending on jurisdiction, context, and local regulatory requirements.

15.2. Exceptions to this Policy

ALL exceptions to this policy must be documented and approved by Legal. Exceptions must be reviewed annually at a minimum.

16. Revision

This Policy must be reviewed annually and whenever material legal, regulatory, or market changes occur. It will be republished only when amendments are made.