

## **Code of Ethics**

### **BUSINESS ETHICS**

#### **Conflicts of Interest**

You should avoid external business, financial, or employment interests that conflict with the Company's business interests or with your ability to perform your job duties. This applies to your possible relationships with any other employer, consultant, contractor, customer, or supplier. Personal gain or advantage must never influence or come before conducting Kedrion business.

For all full-time employees, your job with the Company should be your primary employment. Employees who wish to take on outside employment must first obtain approval from their manager. Work requirements for the Company, including overtime, must take precedence over any outside employment. If an employee becomes aware of a conflict of interest, she or he must immediately report the conflict to a supervisor or may use the Compliance Hotline.

Kedrion will not permit any employee to take an outside job with a company in the same or related business as the Company, or which is in any way a competitor of the Company.

Violations of this rule may lead to corrective action, up to and including termination of employment.

#### **Accounting**

All employees must comply with Kedrion financial policies and processes to ensure that all financial transactions receive required reviews and approvals; that approved transactions are classified consistently and accurately; and that controls over the integrity of transaction data are maintained. Before entering into a transaction on behalf of Kedrion, an employee should consult the Finance Department's policies.

#### **Use of Company Property and Personal Items in the Workplace**

Certain equipment is assigned to the Company's employees depending on the needs of the job. That equipment can include items such as a personal computer or laptop, printer and access to our central computers and servers. This equipment is the property of the Company and cannot be removed from the work area without prior approval from your manager. It is expected that you will treat this equipment with care and report any malfunctions immediately to staff members equipped to diagnosis the problem and take corrective action.

Excessive use of telephones for personal calls or Internet connections for personal use is prohibited. Employees should refrain from bringing personal property to store or use on Company premises.

No employee shall share user names, pass codes or passwords with any other person, except to the extent login credentials correspond with an account assigned to multiple employees. An employee shall immediately inform the IT Department if he knows or suspects that any user name, pass code or password has been improperly shared or used, or that IT security has been violated in any way. Violation of this policy may result in immediate termination from employment.

#### **Internet Access**

Access to the Internet and World Wide Web is given principally for work-related activities or approved educational/training activities. Incidental and occasional personal use may be permitted with manager approval. This privilege should not be abused and must not affect a user's performance of employment-related activities.

The Company itself, or through its Internet Service Provider, may, from time to time, monitor, log and gather detailed statistics on employees' Internet activity.

The Internet system is the property of the Company. By accessing the Internet, Intranet and electronic mail services through facilities provided by the Company, you acknowledge that the Company by itself or through its Internet Service Provider may from time to time monitor, log, and gather statistics on employee Internet activity and examine all individual connections and communications.

1. Responsibilities and Obligations

Employees may not access, download or distribute material that is in breach of the law, or which others may find offensive or objectionable, such as material that is pornographic, bigoted or an incitement to violence.

You must respect and comply with copyright laws and intellectual property rights of both the Company and other persons at all times. When using web-based sources, you must provide appropriate attribution and citation of information to the websites. Software must not be downloaded or installed from the Internet without the prior approval of qualified persons within the Company.

2. Violation of this Policy

In all circumstances, use of Internet access must be consistent with the law and Company policies. Violation of this policy is a serious offense.

This policy is incorporated as part of the terms of employment by the Company. Subject to the requirements of law, violation of this policy may result in a range of sanctions; from restriction of access to electronic communication facilities, to corrective action, up to and including termination of employment.

## **Email**

The email system is the property of the Company. All emails are archived on a server in accordance with our records retention policy, and all emails are subject to review by the Company.

The Company email system is subject to monitoring. System monitoring is done for your protection and the protection of the rights or property of the provider of these services. Please consider this when conducting personal business using Company hardware and software.

Electronic mail is like any other form of Company communication, and may not be used to harass. Your email account is a Company-provided privilege, and is Company property. Remember that when you send email from the Company domain, you represent the Company whether your message is business-related or personal.

Unfortunately, users of email will occasionally receive unsolicited commercial or bulk email (spam) which, aside from being a nuisance and a drain on IT resources, might be a means to spread computer viruses and other malicious software. Avoid opening unsolicited messages and report any suspicious email to the administrator. Delete all spam immediately. Do not reply to the message in any way, even if it states that you can request to be removed from its distribution list. If delivery persists, contact the email administrator who will block any incoming email from that address.

Users should be aware that spammers have the ability to access email addresses that are listed as senders or recipients on email messages, on websites, user discussion groups, and other internet areas. Therefore, you should be cautious about using and disclosing your company email address. If you use email for information gathering purposes, we strongly recommend that you not use your company email address, but rather establish a separate email account for that purpose with a free email service, such as yahoo.com, hotmail.com or google.com.

## **Social Media**

Kedron employees are entitled to participate in Social Media and express personal opinions in public forums. However, employees must be aware that there are limitations when posting statements that include Kedron products. Employees must be aware of Kedron policies and may not violate Company policies, procedures or guidance when participating in Social Media.

Social media channels, such as Facebook, Twitter, LinkedIn and others, may represent an effective way to interact with present and potential Kedron clients, employees and other stakeholders. Employees are required to observe social media policies.