

Code of Ethics and Business Conduct

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Introduction

This Code of Business Conduct and Ethics (the "Code") has been approved by the Board of Directors (the "Board") of Isolations LLC. and is intended to assist all employees, officers, directors, agents and each of its direct and indirect subsidiaries (collectively, the "Corporation") to maintain the highest standards of ethical conduct in corporate affairs. This Code is intended to comply with all applicable laws and regulations.

Specifically, the purpose of this Code is:

- to encourage among employees a culture of honesty, accountability and mutual respect;
- to provide guidance to help employees recognize ethical issues; and to provide mechanisms to support the resolution of ethical issues

Compliance with laws, regulations, and business practices means not only observing the law, but also conducting corporate business in a way that recognizes our ethical responsibilities and fulfills them. Where local laws are less restrictive than this Code, we comply with this Code, even if our conduct would otherwise be legal. On the other hand, if local laws are more restrictive than the Code, we always, at a minimum, comply with those laws.

Antitrust and Competition Laws

All employees of Isolations LLC and its subsidiaries must comply with all applicable antitrust and competition laws in the performance of their responsibilities for and on behalf of the company. In all operations and all functions supporting those operations, no employee shall engage in any conduct in violation of the antitrust or competition laws. It is the responsibility of each employee to recognize potential antitrust or competition law concerns as they arise and to consult with the Legal Department of his or her company or international region before any action is taken.

Therefore, Isolations employees must not agree with any competitors to (i) fix or control prices, either by agreeing directly with a competitor or any other method, such as through third parties; (ii) structure or orchestrate bids to direct a contract to a certain competitor or reseller (bid rigging), including abstaining from bids or submitting noncompetitive or “courtesy” bids; (iii) boycott suppliers or customers; (iv) divide or allocate markets or customers; or (v) limit the production or sale of products or product lines. customer’s business. Agreements like those listed above are against public policy and Isolations policy. We must never engage in discussions of such matters with representatives of other companies, including Isolations partners. You should promptly report to the Isolations Legal Department any instance in which employees or third parties initiate such discussions.

Contracts or other arrangements that involve exclusive dealing, tie-in sales, price discrimination, or other terms of sale may be unlawful under applicable antitrust or competition laws. You should not enter into such arrangements without the approval of the Isolations Legal Department. Requests for the issuance of exclusivity certificates or employee involvement in drafting public tender bidding documents are generally prohibited and should also be raised to Isolations Legal for further review and approval.

Isolations also strives to ensure that our practices comply with Armenian antitrust laws. In addition to local laws, antitrust laws of the Armenia apply to our international business operations and transactions, including imports to and exports from the Foreign courtiers.

Isolations has developed a substantial partner network through which we extend our reach to industry sectors and customers in the Armenia. Isolations is committed to ensuring that our partners comply with all applicable laws. To support this objective, Isolations conducts enhanced reviews of certain transactions in select geographies and may obtain end-user documentation and information necessary for anti-bribery compliance purposes while fully respecting antitrust laws. Only authorized non-sales personnel, who are obligated to protect the information from further unauthorized disclosure, may collect and access such documents and information.

Antitrust and competition laws are complex; please seek advice from the **Isolations Legal Department** on any related questions.

Improper Payments, Money Laundering, and Economic Boycotts

Isolutions believes in doing business honestly and is committed to transparency in our business practices. We have no tolerance for corruption and bribery in connection with our business. Isolutions comply with anti-corruption laws, Corrupt Practices Act (FCPA) and other similar international anti-corruption laws outlaw bribery in all countries in which we do business. Isolutions is also committed to ensuring that our partners comply with all applicable laws, including anti-bribery and anti-corruption laws. To support this objective, Isolutions conducts enhanced reviews of certain transactions in select geographies and may obtain end-user documentation and information necessary for anti-bribery compliance purposes while fully respecting antitrust laws. Only authorized non-sales personnel, who are obligated to protect the information from further unauthorized disclosure, may collect and access such documents and information.

We do not offer or pay bribes. You are prohibited from offering, promising, authorizing, directing, paying, making, or receiving any bribes, kickbacks, or payments of money or anything of value (directly or indirectly) to improperly obtain business or any other advantage for Isolutions or yourself. The FCPA and other similar international anti-corruption laws outlaw bribery.

Penalties for violating these laws are severe and can include prison time and large fines for you personally.

The above prohibition is applicable to

- Government and public sector, which include public utilities, higher education, public healthcare entities, and public international organizations and their employees or officials
- Political parties or candidates for political office
- Business entities partially or wholly owned or controlled by government interests (often referred to as state-owned enterprises) and their employees or officials
- Privately-held commercial companies and their employees
- Isolutions employees
- Any other third party

Additionally, Isolutions prohibits all forms of money laundering, which involves disguising or channeling unlawfully obtained money, or transforming such money into legitimate funds.

You must not participate in any economic boycott not sanctioned by the RA Government. You must not provide information that could be construed to support any such unsanctioned boycotts.

Dealing with Government

Isolutions strictly observe the laws, rules, and regulations that govern the acquisition of goods and services by any governmental entity of any country and the performance of government contracts. Activities that may be appropriate when dealing with nongovernment customers may be improper and even illegal when dealing with government. Isolutions employees who deal with any governmental entity, including public international organizations, are responsible for knowing and complying with all rules that apply to government contracting and interactions with government or public sector employees and officials, including but not limited to the following:

Isolutions employees must not attempt to obtain, directly or indirectly, from any source, procurement-sensitive information that is not publicly available or otherwise authorized for disclosure by the government; confidential internal government information, such as pre-award, source selection information; or any proprietary information of a competitor, including, for example, bid or proposal information, during the course of a procurement or in any other circumstances where there is reason to believe that the release of such information is unauthorized.

Isolutions employees must ensure the submission of accurate invoices to the government and comply with all laws regarding invoicing and payments.

Isolutions employees must not give or offer, either directly or indirectly, any gratuity, gift, favor, entertainment, loan, or anything of monetary value to any government or public sector employee or official except as maybe permitted by applicable law. Isolutions required to establish and maintain appropriate internal controls to ensure compliance with all applicable local country and RA laws concerning prohibitions on offering anything of value to government and public sector employees or officials.

Isolutions employees must not provide, attempt to provide, offer, or solicit a kickback, directly or indirectly, to obtain or reward favorable treatment in connection with any transaction.

Isolutions employees must not pay or enter any agreement to pay, directly or indirectly, a contingent fee to any party for the purposes of obtaining a government contract or influencing government action. Isolutions employees may not receive any contingent fees or participate in any influence/referral fee program on any transaction involving a government or public sector end user (this includes, but is not limited to, public higher education, public healthcare, and utility entities). There are additional policies that govern the methods in which Isolutions is allowed to compensate its Partners, particularly for those transactions that involve government or public sector employees and officials.

If Isolutions selling or offering to sell commercial products to the RA Government, should be familiar with and must ensure compliance with the laws and regulations concerning the sale of commercial products and sales to government and, if applicable to you, the Multiple Award Schedule (MAS) contracting regulations of the General Services Administration (GSA).

Lobbying of Government Officials

Our interactions with the government are generally governed by lobbying laws and regulations. Lobbying is any activity that attempts to influence laws, regulations, policies, and rules, but in certain jurisdictions can also cover sales and business development activity. These laws can apply to elected officials, as well as appointed officials and government employees. The company may have an obligation to register and/or report the company's lobbying activities under applicable law, including activities by employees and outside consultants or advisors on government relations. You are responsible for knowing when your activity or the activity of any third party you engage with on government matters for Isolutions may be considered lobbying, and should consult the Isolutions Legal Department for guidance.

Business Courtesies that May Be Extended

Isolutions use discretion and care to ensure that expenditures on customers, Isolutions personnel, or representatives are reasonable, ordinary, and proper. Isolutions ensure that expenditures could not reasonably be construed as a bribe or an improper attempt to secure unfair preferential treatment or violate applicable laws and regulations. A general guideline for evaluating whether a business courtesy is appropriate is to ask whether public disclosure could be embarrassing to Isolutions, Partner, or the recipient.

Business Courtesies that May Be Received

Isolutions responsible for ensuring that acceptance of any business courtesies, gifts, or entertainment is proper and could not reasonably be construed as an attempt by the offering party to secure favorable treatment or otherwise violate applicable laws and regulations.

Financial Integrity

Accurate and reliable financial and business records are of critical importance in meeting Isolations financial, legal, and business obligations. Isolations financial books, records, and statements must properly document all assets and liabilities and accurately reflect all transactions of the company. No false entries are ever permitted on Isolations books or records, for any reason. Below are some helpful guidelines regarding financial record keeping.

Billing of time or expenses by consultants, submission of Isolations timecards, entry of orders by sales administrators, and submission of travel and expense reports shall be made timely and accurately and in compliance with Isolations policy, professional standards, regulations, and laws.

No documents shall be inappropriately altered or signed by those lacking proper authority. Isolations funds or assets must not be used for any unethical, inappropriate, or illegal purpose.

The handling and disbursement of funds related to an Isolations transaction must be pursuant to a duly authorized Isolations written contract with clearly defined procedures.

No undisclosed or unrecorded fund or asset related to any Isolations transaction shall be established or maintained for any purpose.

No payment on behalf of Isolations shall be made or approved with the understanding that it will or might be used for something other than the stated purpose.

All approval requests for nonstandard discounts must be accurate and commercially justified. Margins derived from misleading and/or unjustified nonstandard discounts are inappropriate and may not be used to pay or otherwise reward an Isolations customer, employee, or other third party.

Placing an order with Isolations without the existence of a corresponding end user agreement (also known as “pre-loading” or “channel stuffing”) is not an acceptable Isolations business practice and is prohibited. Isolations partner agreements require partners to provide a copy of the end user agreement (Proof of End User—POEU) documentation upon Isolations request and such documentation is required for certain orders to be booked as outlined in Isolations **Revenue Recognition Policy**.

In working with Isolations partners (VADs, resellers, and the like), you are expected to maintain neutrality and take all reasonable measures to ensure partner adherence to Isolations policies and contractual obligations. Partners or other third parties should never be engaged to make or facilitate improper payments, misrepresent the nature or substance of a transaction, or structure deals in a manner intended to circumvent the design and intent of Isolations policies and controls.

Intellectual Property and Obligations of Confidentiality

Besides our people, Isolations most important assets are its intellectual property rights, which include

- Copyrights
- Patents
- Trademarks
- Trade secrets

We are each responsible for protecting Isolations intellectual property rights by complying with Isolations policies and procedures for their protection. Maintaining the confidentiality of Isolations trade secrets and proprietary information is an important element of such protection. This obligation continues even after you leave Isolations..

We also respect the intellectual property of others. Isolations will provide any software necessary for you to perform your functions adequately under appropriate licensing agreements with vendors. It is against Isolations policy to use, copy, display, or distribute third-party copyrighted software, documentation, or other materials without permission or approval from Isolations Legal Department. For example, you may not post another entity's copyrighted content to any internal or external website or other electronic forum without first obtaining the necessary approvals. You are not permitted to use or copy software or documentation except to the extent that applicable license agreements allow. Consult the Isolations Legal Department website for relevant policies and guidelines, some of which are

Information Protection Policy

Employee Proprietary Information Agreement

Copyright Compliance Policy

Policy on Patent Communication and Searches.

You are required to protect all confidential information that you have access to in connection with your Isolations employment. The **isolations Information Protection Policy** provides the requirements for treatment of confidential information. It also provides a description of the different categories of confidential information, which are

Public

Confidential—Isolations Internal

Confidential—Isolations Restricted

Confidential—Isolations Highly Restricted

The Information Protection Policy provides guidance on the proper handling of each information category, including restrictions on use, disclosure, storage, transmission, and deletion. All information related to Isolations business that is not intended for public disclosure or any information identified as confidential by Isolations customers, partners, prospective customers, and vendors should be considered confidential.

Confidential information includes

- Information customers provide to Isolations for the performance of cloud, technical support, consulting, and other services
- Source code
- Inventions or developments (regardless of the stage of development)
- Marketing and sales plans
- Competitive analyses
- Product development plans
- Pricing
- Potential contracts, mergers, or acquisitions
- Financial plans or forecasts
- Isolations employee and customer personal information

Securities and Insider Trading Laws

Isolutions expects you to comply with applicable insider trading and securities laws. Isolutions maintains an insider trading policy, which is applicable to all employees worldwide, non-employee directors, and the immediate family members of employees and directors. The **Insider Trading Policy**, sets forth your obligations under the law and as required by Isolutions, regarding trading in the securities of Isolutions and other companies. You are expected to understand the policy and comply with it.

If you trade in Isolutions securities or the securities of any other company trading on a Foreign stock exchange, you are subject to Foreign securities laws, as well as any other securities or insider trading laws that may apply to you locally, including Isolutions Insider Trading Policy. Failure to comply with insider trading and securities laws may result in substantial civil and criminal penalties.

Under Isolutions Insider Trading Policy, if you possess **material, nonpublic information** (also referred to as “**inside information**”) gained through your work at Oracle, you may not trade in Isolutions **securities** or the securities of another company to which the information pertains. You also may not pass on to others (for example, a “tip”) material, nonpublic information. These restrictions also apply to your immediate family members. **Material information** is any information that a reasonable investor would consider important in a decision to buy, hold, or sell securities. It includes any information that could reasonably be expected to cause a change in the price of securities of Isolutions or the securities of another company to which the information relates..

Trade Compliance Laws and Regulations

Isolutions is committed to complying with all applicable global export, import, and economic sanctions, laws, and regulations. Compliance with global trade laws and regulations protects Isolutions ability to conduct international business. Failure to do so can result in disciplinary action for the company, serious supply chain disruptions, loss of sale and service opportunities, monetary penalties, fines and imprisonment for individual employees and their management chain, and the potential revocation of our trade privileges.

You are responsible for understanding how trade compliance laws and regulations apply to your job, and strict adherence to these laws is required.

Conflicts of Interest

The term “conflict of interest” describes any circumstance that could cast doubt on your ability to act in Isolutions best interests and to exercise sound business judgment unclouded by personal interests or divided loyalties. The term also refers to situations in which it appears that your business judgment has been compromised. The **Conflict of Interest Policy** explains how to avoid financial, business, or other relationships that create conflict of interest issues and how to deal with those situations.

Contracting

You are expected to compete fairly and ethically for all business opportunities. If you are involved in the purchase, sale, or licensing of products/services, the negotiation of agreements, or the delivery of services to customers, you are expected to understand and honor the terms of Isolutions contractual agreements. Also, you must ensure that all statements, communications, and representations to customers, suppliers, and internal approvers are accurate and truthful.

Advertising and Marketing

Unfair methods of competition and deceptive practices are prohibited. Examples of these include making false or misleading statements about Isolations or Partners products or services, falsely disparaging a Partner competitor or its products or services, making product or service claims without facts to substantiate them, or using another company's trademarks in a way that confuses the customer as to the source of the product or service.

Business and Employment Relationships

Isolations affirms the principle of equal employment and business opportunities without regard to any protected characteristic, including but not limited to: race, religious creed, national origin, color, sex or gender, gender identity or expression, age, mental or physical disability, mental condition, pregnancy, marital status, national origin/ancestry, genetic information, political affiliation, military and protected veteran status, sexual orientation, or any other characteristic protected under federal or state law or local ordinance. Isolation policy prohibits harassment in any form and Isolations practice and promote a work environment free from harassment, as appropriate under local laws.

Human Rights of Workers

Isolutions uphold the human rights of workers and treat them with dignity and respect. Isolutions comply with fair labor and antislavery practices that allow for freely chosen employment, which includes the prohibition of child labor, human trafficking, and slavery. Additionally, the adherence to applicable wage and labor laws and standards is.

Physical abuse, sexual or other harassment, and discrimination on the basis of race, religious creed, caste, national origin/ancestry, genetic information, military and protected veteran status, religion, age, disability, gender, gender identity or expression, pregnancy, marital status, sexual orientation, union membership, political affiliation, or any other characteristic protected under applicable law or local ordinance is strictly prohibited.

Environment, Health, and Safety

Isolutions comply with all applicable environmental laws and regulations and are expected to work to reduce consumption of resources, including raw materials, energy, and water, throughout all aspects of the product or service lifecycle. Isolutions do best to reduce or eliminate waste of all types by implementing appropriate conservation measures in our facilities and by recycling, re-using, or substituting materials.

Worker health, safety, and well-being are also important to Isolutions. Isolutions provides and maintains a safe and healthy work environment and fully comply with all applicable safety and health laws, regulations, and practices while also minimizing the environmental burden of company operations and products on the environment. Isolutions taking steps to minimize the causes of hazards inherent in the working environment, prevents workplace accidents and injuries, and promotes safe and healthy workplaces.

Duty to Cooperate

Isolutions cooperate with Partners' periodic requests for documents and/or information made in connection with Oracle's partner onboarding and due diligence processes. Isolutions ready to provide certain information identifying company structure, the potential existence of conflicts of interest, and compliance with RA and other applicable Partner country laws. Isolutions comply with all applicable local and Partner country laws, requests for information are designed to identify a number of specific compliance issues, which would need to be resolved before being allowed to participate in discounts or benefits associated with the distribution and promotion of Partner products. Isolutions obligated to provide truthful and accurate responses to such requests for information and Partners reserves the right to request additional information at any time. Partners can terminate our membership or distribution rights for failure to satisfy our obligation of providing truthful and accurate responses to such information requests.

Isolutions cooperate with any audit request made by Partners as required by PartnerNetwork Agreements or any Distribution Agreement.

Reporting Violations

Isolutions reports to Partner any conduct, including conduct of any employee, that you believe in good faith to be an actual, apparent, or potential violation of this Code. Prompt reporting of violations is in the best interest of everyone. Reports will be handled as confidentially as possible. Isolutions provides reasonable assistance to Partner with any investigation into a violation of this Code or applicable law.

Enforcement

Isolutions is committed to maintaining an internal investigations process focused on accuracy, precision, fairness, and respect for all parties involved. Investigations are conducted in compliance with applicable law and Oracle policies and in such a manner that all parties receive ethical and fair treatment. Isolutions complies with applicable laws in conducting investigations. To the extent permitted by applicable law, and when appropriate, investigation methods may include interviews with the parties and witnesses, review of relevant financial, electronic, and other records, reviews of publicly available information, and monitoring and/or analysis of computers, systems, offices, and other resources.



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