

CODE OF ETHICS / CONFLICT OF INTEREST POLICY

Purpose and Scope

Caylent is committed to achieving the highest standards of professionalism and ethical conduct in its operations and expects all Cayliens to conduct their business according to the highest ethical standards of conduct. This Policy is intended to increase awareness of potential conflicts of interest and to establish a procedure for reporting them.

Conflict of Interest

Cayliens should always act in the best interest of Caylent and not permit outside interests to interfere with their job duties. Caylent prohibits all Cayliens from using their position with Caylent or Caylent's relationship with its customers, vendors or contractors for private gain or to obtain benefits for themselves or members of their family.

For purposes of this Policy, a potential conflict of interest occurs when a Caylien's outside interests (for example, financial or personal interests) interfere with Caylent's interests or the Caylien's work-related duties. For example, a conflict of interest can occur when a Caylien is in a position to influence a decision that may result in a personal gain for the Caylien or the Caylien's family member as a result of Caylent's business dealings.

If you have a question about whether a situation is a potential conflict of interest, please contact Human Resources (hr@caylent.com).

Political Activity

At Caylent, we acknowledge it is important that Cayliens keep their political activities separate from their responsibilities at Caylent. Cayliens are prohibited from using Caylent funds or resources, either directly or indirectly, to help fund political campaigns, political parties, political candidates, or anyone associated with them. Caylent funds may not be used to support political action committees (PACs) or make political payments under the guise of charitable donations. Cayliens must ensure that any political statements are clearly expressed as those of the individual, not those of Caylent.