



FoodChain ID Code of Conduct

Dear IDers,

I am pleased to provide this introduction to the FoodChain ID Code of Conduct. As we grow and evolve as an organization, it is critical to establish a set of guiding principles that define who we are, and uphold the values that drive our actions and decisions.

At FoodChain ID, we are committed to making a positive impact on the world around us. Our Code of Conduct serves as a compass, guiding us towards ethical excellence and ensuring that our actions align with our mission, vision, and values. By adhering to these principles, we are building a culture of integrity, respect, and transparency that resonates within our organization and in the relationships we foster with our partners, clients, and the global community. This safeguards our reputation, strengthens our partnerships, and creates an environment that attracts top talent driven by shared values.

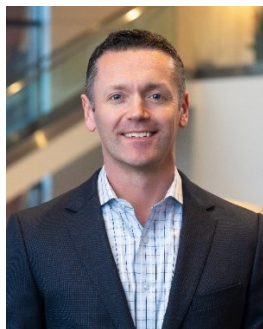
This Code of Conduct is not a static document; it is a living embodiment of our collective dedication to doing what is right. It empowers us to navigate complex situations, make difficult decisions, and maintain our commitment to honesty and fairness. We encourage open dialogue and an ongoing conversation about these principles to ensure that they remain relevant and resonate with every member of our team.

You have my sincere appreciation for embracing these guidelines and incorporating them into the fabric of our daily operations. Together, we are shaping the future of FoodChain ID and contributing to a world where ethical conduct is not just an aspiration, but a fundamental expectation.

Thank you for your dedication to our shared values and for your role in upholding the highest standards of integrity at FoodChain ID.

Sincerely,

Conor Kearney, CEO





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Introduction

This Code of Conduct (this “Code”) provides a broad overview of the basic ethical principles that we share at FoodChain ID Group, Inc. (“FoodChain ID” or the “Company”) and that guide our conduct. At FoodChain ID we take great pride in maintaining a work environment that promotes respect, integrity, and professionalism. The Code outlines the principles and standards that all directors, officers, employees, contractors, consultants, and other internal or external representatives of the Company are expected to follow. By adhering to this Code, we collectively contribute to a positive and inclusive workplace culture and uphold the reputation and values of our organization. Violations of this Code may result in disciplinary action, varying from reprimand to termination. Should you have any questions regarding these policies, please contact your manager or FoodChain ID’s HR team.

The Company’s good name and reputation depend, to a very large extent, upon you taking personal responsibility for maintaining and adhering to the policies and guidelines set forth in this Code. Your conduct on behalf of the Company must be guided by the ethical principles, policies and guidelines set forth in this Code.

Values

Our company values serve as the moral compass guiding every aspect of our operations. Rooted in integrity, respect, and excellence, these values define our identity and shape our interactions with each other, our partners, and the world. In this Code, we outline the principles that embody our commitment to upholding these values in every action we take.

Our IDentifiers at FoodChain ID :

- We empower our Teams to make decisions
- We understand and enable our customers success
- We communicate transparently and honor our promises
- We are objective and leverage data to inform decisions
- We are proactive and quick to respond
- We develop the best decisions by working together
- We embrace creativity and innovation
- We are committed to continuous learning and building expertise
- We push boundaries and welcome change

In addition to our values, this Code lays out our shared guidelines for ways of working and behaviors as employees, partners, and clients of FoodChain ID globally.

1. Ethical Behavior

Ethical behavior in today's fast-paced, digitalized world is foundational, shaping both individuals and organizations. This section highlights the principles steering our actions, promoting trust, respect, and responsibility. It is our commitment to ethical practices in every aspect of doing business and interacting with others.

1.1 Honesty and Integrity: We expect all employees to act with honesty and integrity in all their interactions, both within the Company and with external stakeholders. This includes being truthful, transparent, and avoiding conflicts of interest.

1.2 Conflicts of Interest: Employees must avoid situations that may create a conflict between their personal interests and those of the Company. If a potential conflict arises, employees must disclose it promptly. In avoiding conflicts of interest, you must comply with the following principles:

- Do not hold a financial interest in or accept employment from an entity doing business with FoodChain ID if it would or could conflict with the performance of your duties.
- Do not take any business-related action for your personal benefit.
- Any outside employment, business ventures, or financial activities cannot interfere with the performance of your duties.
- Protect Company assets as if they were your own.
- Do not take for yourself any opportunities that are discovered or advanced through the use of your position with FoodChain ID or any of FoodChain ID's property or information.
- No family member should report directly to another family member.

1.3 Anti-Corruption: FoodChain ID does not tolerate bribery or kickbacks. Employees are prohibited from directly or indirectly making, promising, authorizing, offering, paying, soliciting, or accepting anything of value to secure or allow an improper advantage to obtain or retain business, or direct business to any other person or entity. This prohibition includes payments to or from third parties, including foreign officials, in which the associate knows, or has reason to know, the payment is a bribe, kickback, or otherwise intended to secure an unfair advantage. **Reference: Foreign Corrupt Practices Act "FCPA"**

1.4 Anti Money Laundering and Tax Evasion: FoodChain ID is committed to fully complying with all applicable anti-money laundering and will only accept funds received from legitimate sources. In addition, we only conduct business with reputable clients involved in legitimate business activities. We also reject doing business in a way that assists or facilitates tax evasion by our suppliers, clients, or other third parties.

1.5 Fair Competition: Competition laws are in force around the world to prevent agreements and practices that may significantly alter or unduly restrict competition in the market. We do not obtain competitive intelligence by illegal or unethical means. When working with clients we will not seek unauthorized access to material and will handle client classified or proprietary marked information in accordance with the appropriate legislation, policies, and processes.

1.6 Human Rights: Human rights are inherent to everyone whatever their nationality, place of residence, gender, national or ethnic origin, religion, or any other similar status. FoodChain ID has a zero-tolerance

approach to all forms of human rights abuses, including modern slavery and child labor, within our business, operations, and supply chain.

1.7 Environmental Compliance and Sustainability: At FoodChain ID it is our shared responsibility to be a good steward of nature and reduce the environmental impact of our operations on the environment. This may include our energy use, recycling, waste, pollution, natural resource conservation and treatment of animals. We shall follow all applicable environmental laws and regulations and do our part to identify additional opportunities to reduce the environmental impact of our business.

1.8 Compliance with Laws and Regulations: At FoodChain ID we underscore our unwavering commitment to adhering to all relevant laws and regulations, ensuring our actions remain ethically grounded and legally sound. Every employee must be well-versed in applicable legal standards and diligently uphold them in all aspects of our operations.

1.8.1 Legal Compliance: Employees are required to comply with all applicable laws, regulations, and company policies in the course of their work. Violations may result in disciplinary action, up to and including termination.

1.8.2 Policy Compliance: Employees are expected to adhere to all company policies in addition to the Code. Examples include Accounting & Finance policies and HR policies.

2. Respectful Workplace

At FoodChain ID, we are dedicated to cultivating an environment where every individual is treated with respect, dignity, and fairness. This section outlines the standards and behaviors that guide our interactions, ensuring a workplace that is free from harassment, discrimination, and any form of disrespectful conduct.

2.1 Harassment and Discrimination: We are committed to providing a workplace free from harassment, discrimination, and any form of unlawful bias. Employees must treat one another with respect and dignity, regardless of their race, color, religion, gender, sexual orientation, age, disability, or any other protected characteristic. We do not tolerate any form of harassment, including verbal, physical, or online harassment. Employees are encouraged to report any incidents promptly.

2.2 Diversity, Equity, and Inclusion: We value diversity and actively promote an inclusive work environment where all individuals feel welcome and appreciated for their unique perspectives and contributions.

2.3 Anti-Retaliation: We prohibit retaliation against any individual who reports a concern or participates in an investigation related to potential violations of this Code or company policies. Any individual who reports concerns in good faith will be safeguarded from any form of adverse action, fostering a culture of openness and accountability.

2.4 Workplace Violence: We are committed to providing a safe and secure workplace for all employees. Workplace violence is unacceptable and will not be tolerated under any circumstances. Workplace violence includes any behavior, action, threat, or verbal abuse that may cause physical, emotional, or psychological harm to employees, visitors, or clients.

3. Confidentiality

In our business, confidentiality is paramount. This section emphasizes its vital role in our way of doing business. By adhering to these guidelines, we ensure our integrity and trust internally but also with external parties of all kinds.

3.1 Protection of Personal Information: Employees must respect the privacy of individuals' personal information and only use it for legitimate business purposes. When handling financial and personal information about clients or others with whom FoodChain ID has dealings, observe the following principles:

- Collect, use, and retain only the personal information necessary for the Company's business. Whenever possible, obtain any relevant information directly from the person concerned. Use only reputable and reliable sources to supplement this information.
- Retain information only for as long as necessary or as required by law. Protect the physical security of this information.
- Limit internal access to personal information to those with a legitimate business reason for seeking that information. Use only personal information for the purposes for which it was originally obtained. Obtain the consent of the person concerned before externally disclosing any personal information unless legal process or contractual obligation provides otherwise.

3.2 Protection of Confidential Information: Employees must safeguard all confidential and proprietary information of the company, as well as any sensitive data of clients, partners, or other stakeholders, from unauthorized access, use, or disclosure. Any question about whether information is confidential should be directed to your manager or FoodChain ID Legal.

4. Company Property and Assets

Our organization is dedicated to the effective management and responsible use of company property and assets. Company property and assets include all tangible and intangible items owned, leased, or otherwise possessed by the organization, such as equipment, vehicles, facilities, intellectual property, software, and any other resources used in our operations.

4.1 Responsible Use of Company Resources: Employees must use Company resources responsibly and solely for legitimate business purposes. Unauthorized use, theft, or misappropriation of company assets is strictly prohibited. Any suspected incident of fraud or theft should be promptly reported to your manager or, if appropriate, FoodChain ID HR for investigation.

4.2 Intellectual Property: Respect for intellectual property rights is essential. Employees must not use, reproduce, or share copyrighted materials without proper authorization. Intellectual property includes inventions, patents, trademarks, copyrights, trade secrets, designs and any other original creations resulting from the intellectual efforts of employees, stakeholders, and consultants.

4.2.1 Ownership and Rights

- a. All intellectual property created by employees within the scope of their employment is the property of the Company.
- b. Intellectual property developed using company resources, time, or funding also belongs to the Company.

4.3 Technology: Essential to our success as a Company is our ability to develop and increasingly use state-of-the-art technology in day-to-day operations. The Company's intellectual property is one of its most valuable assets. Intellectual property refers to creations of the human mind that are protected by various national laws and international treaties. Intellectual property includes copyrights, patents, trademarks, trade secrets, design rights, logos, expertise and other intangible industrial or commercial property. The Company's employees and representatives must protect and, when appropriate, enforce its intellectual property rights. The Company also respects intellectual property belonging to third parties. It is the Company's policy not to knowingly infringe upon the intellectual property rights of others.

5. Workplace Safety

At FoodChain ID, we are committed to providing a safe and healthy working environment for all employees, contractors, visitors, and stakeholders. This section outlines our policies and guidelines related to health and safety within the workplace.

5.1 Health and Safety: We prioritize the health and safety of our employees. Employees are expected to follow all safety guidelines, report potential hazards, and participate training programs to promote a safe work environment in offices, when traveling and when working from home.

5.1.1 Hazard Identification: All employees must be vigilant in identifying potential hazards within the workplace. This includes physical hazards (e.g., unsafe equipment, trip hazards), chemical hazards (e.g., hazardous substances), biological hazards (e.g., pathogens), ergonomic hazards, and psychosocial hazards.

5.1.2 Reporting Hazards: Any identified hazards or potential risks must be reported immediately to the designated supervisor, manager, or health and safety representative. This enables timely assessment and mitigation of risks.

6. Social Media and Technology

At FoodChain ID we believe in respectful online interaction and the responsible use of technology. In an era shaped by rapid technological progress, social media has redefined communication, offering unparalleled connectivity and information sharing. As digital interfaces become integral to personal and professional life, understanding the nuances of effective communication and ethical digital conduct becomes crucial.

By upholding our principles, we can maximize technology's potential while preserving our core values.

6.1 Social Media: When using social media platforms, employees must be mindful of their role as representatives of the Company and should not disclose confidential information or make disparaging remarks about the Company, its clients or its stakeholders.

6.2 Respectful Communication: When communicating online employees commit to upholding respectful communication in all digital interactions. We value diverse perspectives and treat every individual with courtesy, refraining from personal attacks, offensive language, or discriminatory remarks. We actively listen, engage constructively, and aim to contribute to a welcoming online environment that encourages open dialogue and mutual understanding.

6.3 Responsible Use of Technology: Employees must use technology and communication tools for business purposes only and should be responsible, avoiding misuse or engaging in activities that may harm the company's reputation or jeopardize sensitive information.

For more information about this, please refer to the Acceptable Use Policy.

7. Reporting Violations

Upholding Integrity and Accountability

In any community or organization, maintaining a culture of integrity and accountability is paramount. At FoodChain ID we have created clear procedures for reporting violations of the Code, ensuring that concerns are addressed promptly and transparently without the fear of retaliation. We recognize the importance of offering multiple avenues for reporting, each designed to cater to different preferences and levels of confidentiality.

One such option is our dedicated whistleblowing tool, designed to provide a secure and confidential channel for reporting ethical breaches. This tool ensures that individuals can voice their concerns without fear of retaliation.

If you want to report a misconduct using our Whistleblowing tool, please read our Whistleblowing policy and use the appropriate channel through the InsIDer or through the tool directly.

We understand that whistleblowing might not suit everyone's situation or comfort level. Therefore, we also encourage individuals to report violations through alternative methods that align with best practices by approaching selected employees via email, a video call or personally if the opportunity arises. You can identify the right person to speak to by visiting our Whistleblowing Policy and navigate to page 5.

By offering a range of reporting mechanisms, including direct communication with supervisors, designated contact persons, or anonymous reporting channels, we aim to ensure that everyone's voice is heard.

If you are unsure whether your case is a breach of our Code, or you have other questions around the topic please contact your HR Business Partner.

Upholding our commitment to transparency and accountability, this section empowers every member of our community to contribute to the maintenance of a safe, respectful, and ethical environment.

Acknowledgement

By upholding our Code, we create a work environment where each member of the FoodChain ID family can thrive and contribute to our shared success. This policy is not exhaustive, and employees are encouraged to seek guidance from the HR department or management if they encounter ethical dilemmas (including potential conflicts of interest) or have questions about compliance.

The company reserves the right to take appropriate disciplinary action in response to any violations of this Code, up to and including termination of employment or business relationships.

This Code is subject to periodic review and updates as needed. By continuing to work with FoodChain ID, employees agree to abide by the most recent version of this policy.