### **VERASITY CODE OF ETHICS**

#### **Conflicts of Interest**

All board members and advisors are required to:

- Conduct themselves and Verasity's business with honesty and integrity, avoiding both actual and apparent conflicts of personal or professional interests.
- Refrain from accepting or being influenced by gifts.

# **Legal Compliance**

All board members and advisors are required to:

- Comply with laws, rules, and regulations of federal, state, and local governments, foreign governments, and other appropriate private and public regulatory agencies that govern our business. While it is difficult to know the details of these laws, it is important to know enough to determine when to seek advice from appropriate personal.
- Provide full, accurate and timely reporting and disclosure of information when requested by the proper authorities.
- Comply with all laws and regulations relating to anti-trust regulations, fair competition, and pricing.
- Refrain from making or accepting any improper payments or kickbacks or asking others to do so.
- Adhere to international human rights conventions.

### **Company Information and Assets**

All board members and advisors are required to:

- Report information accurately and honestly.
- Represent our business and products accurately, openly, and honestly.
- Act with integrity at all times in business transactions and with business information.
- Refrain from using confidential or proprietary information for personal gain, including disclosure of confidential information to a third party, and buying or selling the company's tokens based on nonpublic information.

- Refrain from buying or selling company related tokens within two weeks before any
  major company announcement, release of audit or other such news that would be
  known to influence the token price.
- Comply with the company's disclosure and trading guidelines when buying or selling company tokens.
- Safeguard company property and information.
- Keep confidential all information designated as such concerning the business interests, affairs, or trade secrets of the company or of any of its subsidiary or affiliated companies.

## **Workplace Practices**

All board members and advisors are expected to:

- Promote ethical behavior in the work environment.
- Promptly report dishonest, unethical, or illegal activities by other members to appropriate parties.
- Comply with this Code of Ethics, knowing that failure to do so may result in disciplinary action.
- Ensure that the workplace is free from discrimination and harassment and respect diversity and every individual.

### **Reporting and Enforcement**

Any breach of the above policy may result in disciplinary action.

Internal theft, fraud, or other serious abuses, such as accounting and auditing irregularities, affect everyone. In the most serious cases, the negative impact on a company's reputation and financial well-being can even lead to the loss of jobs. If a board member or advisor becomes aware of theft, fraud, or other abuses in the workplace, he/she should not ignore it.

If a board member or advisor suspects possible violations of the Code of Ethics or laws, such member has the responsibility to contact human resources or another responsible party at Verasity immediately.

Regardless of how any suspected violation is reported, there will be no form of reprisal for doing so. Verasity will investigate fully all matters related to alleged violations and take appropriate action. It is everyone's responsibility to help create and ensure an effective

workplace. Board members and advisors are expected to participate fully in any investigation of alleged misconduct.

Board of Directors Verasity Limited Costa Rica