

## Ethics Policy

### Statement of Purpose

The purpose of this policy statement is to reaffirm FirstLight's strong commitment to the highest standards of legal and ethical conduct in its business practices and to ensure that all employees adhere to proper and legal ethical standards in their business relationships. People feel pride in an organization built upon honesty and integrity.

### Policy on Responsible Behavior

As an integral member of the Company, you are expected to accept certain responsibilities, adhere to acceptable business principles, and matters of personal conduct, and exhibit a high degree of personal integrity at all times. This not only involves sincere respect for the rights and feelings of others, but also requires that you refrain from any behavior that might be harmful to you, your co-workers, or FirstLight, or that might be viewed unfavorably by current or potential customers, or by the public at large. You are encouraged to observe the highest standards of professionalism always.

### Use of Good Judgement

It is virtually impossible to site examples of every type of activity which could give rise to a question of unethical conduct. Therefore, it is important that each of us rely on our own good judgment in the performance of our duties and responsibilities. When situations occur where the proper course of action is unclear, you should request advice from your supervisor. You may also reach out to the Company's legal department. The reputation and good name of FirstLight depends entirely upon the honesty and integrity of each one of us.

### Anti-Bribery and Corruption

You are prohibited from engaging in any form of corruption. FirstLight is committed to conduct its business operations in an ethical manner by maintaining a culture of integrity, transparency, openness, and compliance with applicable law, including but not limited to the United States Foreign Corrupt Practices Act, regulations and all contractual obligations with regards to:

- Prohibition of corruption in all its forms, including but not limited to prohibiting extortion, solicitation, bribery of public officials, private sector bribery, negligent financing of corruption, facilitation payments, nepotism, fraud, and money laundering.
- Prohibiting any offer, promise, gift, request, agreement to accept, receipt of payments, any kind of undue benefits, charitable or political donations, directly or indirectly, to obtain or retain personal or business advantage from any public official, individual, employees or business partners.
- Conducting business operation in line with fair competition (e.g., preventing bid rigging or other mechanisms limiting fair competition in tenders or any form of cartel practices with competitors).

FirstLight's Anti-Money Laundering and Sanctions Policy can be accessed via the company's online employee payroll system. You may also reach out to the Company's legal department with any additional questions.

## Gifts

Employees may not give or receive any gifts or favors to or from any customer, supplier, or competitor (other than a gift of nominal value - \$100.00 or less) without the prior consent of Human Resources. In no event, shall an employee give or receive a gift in the form of cash. Attendance at a reasonable business meal or event (such as sports, arts, etc.) is permissible and does not require the prior consent of Human Resources.

It is impermissible and may be unlawful to give, offer or promise anything of value for the purpose of influencing someone in connection with Company business or a Company

transaction. Similarly, it is impermissible and may be unlawful to solicit, demand, or accept anything of value with the intent of being influenced or rewarded in connection with any company business or transaction.

Company-sponsored events, promotional campaigns, and reasonable customer entertainment expenses are permissible.

## Conflicts of Interest

Employees are prohibited from partaking in any activity or association that creates or appears to create a conflict between the employee's personal interests and FirstLight's business interests. In addition, an employee must not allow any situation or personal interests to interfere with the exercise of independent judgment, or with that employee's ability to act in the best interests of FirstLight.

As a result, we expect that employees will not participate in, through action or communication, any disloyal, harmful, disruptive, competitive, or damaging acts toward the Company. We also prohibit employees from accepting positions of employment with direct competitors or companies with whom FirstLight conducts business.

An actual or potential conflict of interest occurs when an employee is able to influence a decision that may result in a personal gain for that employee or for a relative as a result of FirstLight's business dealings. For the purposes of this policy, a relative is any person who is related by blood or marriage, or whose relationship with the employee is similar to that of persons who are related by blood or marriage

No "presumption of guilt" is created by the mere existence of a relationship with outside firms. However, if employees have any influence on transactions involving purchases, contracts, or leases, it is imperative that they disclose to an officer of FirstLight as soon as possible the existence of any actual or potential conflict of interest so that safeguards can be established to protect all parties. However, it shall be a violation of this section for an employee to have an

undisclosed personal business relationship with a vendor of the Company for which the employee participates in the Company decision making process to engage the vendor. All such relationships must be disclosed to the Company's Chief Legal Officer who may grant a waiver of the prohibition in consultation with the Company's CEO.

Employees have an obligation to conduct business within guidelines that prohibit actual or potential conflicts of interest. This policy establishes only the framework within which FirstLight wishes the business to operate. The purpose of these guidelines is to provide general direction so that employees can seek further clarification on issues related to the subject of acceptable standards of operation. Please contact the legal department for more information or questions about conflicts of interest.

## **Outside Employment**

A FirstLight employee may engage in employment outside the company. However, no employees may engage in outside employment which in any manner interferes with the proper and effective performance of the duties of their position in the company, or results in a conflict of interest with FirstLight's business interests. All employees must inform their supervisors and Human Resources of their outside employment including any self-employment. If the company determines that such outside employment is disadvantageous to the Company, the employee shall be notified in writing. Any employee who engages in employment outside their regular working hours are expected to perform their regular duties first, and outside work cannot be performed on Company time. Additionally, work for another company may not be conducted using company electronics, vehicles, equipment or property.

## **Use of Company Property**

Company property is to be used solely for the Company's business interests and cannot be used for personal use unless prior approval has been given to the employee. Employees are reminded that the benefits of any promotions offered by suppliers are the property of the Company and cannot be used personally by employees without the prior consent of FirstLight.

## **Professional Conduct and Hostile Work Environment**

### **Employee Conduct and Work Rules**

To ensure orderly operations and provide the best possible work environment, FirstLight expects employees to follow rules of conduct that will protect the interests and safety of all employees and the organization.

It is not possible to list all the forms of behavior that are considered unacceptable in the workplace. The following are examples of infractions of rules of conduct that may result in disciplinary action, up to and including termination of employment:

- Theft or inappropriate removal or possession of property
- Working under the influence of alcohol or illegal drugs

- Possession, distribution, sale, transfer, or use of alcohol or illegal drugs in the workplace, while on duty, or while operating employer-owned vehicles or equipment
  - Fighting or threatening violence in the workplace
  - Negligence or improper conduct leading to damage of employer-owned or customer-owned property
  - Unauthorized or personal use of Company equipment or vehicles
  - Insubordination or other disrespectful conduct
  - Violation of safety or health rules
  - Sexual or other unlawful or unwelcome harassment
  - Possession of dangerous or unauthorized materials, such as explosives or firearms, in the workplace
  - Excessive absenteeism or absence without notice
  - Unauthorized use of telephones, mail system, or other employer-owned equipment
  - Unauthorized disclosure of business "secrets" or confidential information
- Violation of personnel policies
- Unsatisfactory performance or conduct

Employment with FirstLight is at the mutual consent of FirstLight and the employee, and either party may terminate that relationship at any time, with or without cause, and with or without advance notice.

## **Professional Conduct and Coworker Respect Policy**

FirstLight strives to maintain a sound, friendly, hospitable work environment that fosters productivity. We are realistic, however, and know that there will be different opinions and personalities that may not be compatible among our employees.

However, it is our policy to treat every individual with respect and courtesy, and for all co-workers to treat each other with that same respect and courtesy. All employees are asked to maintain a professional manner when dealing with co-workers, management, and customers.

Should a situation arise that requires intervention, contact your direct manager. They will help you resolve the matter in a confidential and professional manner. Under Company policy, complaints will be documented and securely filed for record retention purposes.

## **Hostile Work Environment Prevention Policy**

FirstLight recognizes the fact that our employees cannot be expected to function effectively in an environment where they do not feel safe from violence, harassment, threat, or any type of bodily or material harm. For this reason, any employee who engages in any type of hostile behavior is subject to immediate termination of employment by the Company.

For the purposes of this policy, hostile behaviors include: physical attacks (hitting, shoving, pelting with objects), threats (verbal or written communication of an intent to inflict physical, material, or mental harm), harassment (any action, behavior, or communication intended to discomfort, intimidate, or scare others), and destruction of property (any action intended to damage or destroy another employee's or the Company's property).