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**CODE OF BUSINESS CONDUCT AND ETHICS**

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*AS OF MARCH 2024*

## LETTER FROM THE CEO

MARCH 2024

To all Directors, Officers and Employees of Devo:

Devo (the “**Company**”) is dedicated to conducting its business in compliance with all applicable laws, rules and regulations. Our directors, officers and employees are expected to perform to the highest standards of ethical conduct consistent with legal and regulatory requirements. We have an obligation to our employees, shareholders, customers, partners and other business contacts to be honest, fair and forthright in all of our business activities.

As a director, officer or employee of the Company, you are faced every day with a number of business decisions. It is your personal responsibility to uphold the Company’s high standards of business ethics in each and every one of these situations. It is not possible for our Code of Business Conduct and Ethics (the “**Code**”) to address every situation that you may face, but it may provide guidance as to how to fulfill your obligations, how to seek advice and resolve questions about the appropriateness of conduct and how to report possible violations of the Company’s legal obligations or ethical principles. The Company may ask you for confirmation of compliance with the Code, other corporate policies or applicable laws and regulations from time to time in the form of written attestation letters or otherwise.

Finally, remember that the Code is a living document and will be updated from time to time to meet the Company’s changing needs.

We encourage you to take this opportunity to review our policies and to discuss any questions you may have with your supervisor or with the Company’s Legal Counsel. The guidelines set out in this Code are to be followed at all levels of this organization by our directors, officers and employees. We rely on you to help us uphold our core values and conduct our business honestly, fairly and with integrity.

Sincerely,

The signature block consists of a blue DocuSign logo on the left, a blue bracketed area containing the text "DocuSigned by:" above a handwritten signature "Walter Scott" in black ink, and the alphanumeric string "C73A564C1B1545F..." below the signature. Below the bracketed area, the name "Walter Scott" and title "Chief Executive Officer" are printed in a black sans-serif font.

DocuSigned by:  
Walter Scott  
C73A564C1B1545F...  
Walter Scott  
Chief Executive Officer

## **INTRODUCTION**

### **Purpose**

This Code of Business Conduct and Ethics contains general guidelines for conducting the business of the Company with the highest standards of business ethics consistent with applicable laws and regulations. To the extent this Code requires a higher standard than required by commercial practice or applicable laws, rules or regulations, we adhere to these higher standards.

This Code applies to all directors, officers and employees of the Company and its subsidiaries (which, unless the context otherwise requires, are collectively referred to as the “**Company**” in this Code). We refer to all persons covered by this Code as “Company employees” or simply “employees.”

### **Seeking Help and Information**

This Code is not intended to be a comprehensive rulebook and cannot address every situation that you may face. If you feel uncomfortable about a situation or have any doubts about whether it is consistent with the Company’s ethical standards, seek help. We encourage you to contact your supervisor for help first. If your supervisor cannot answer your question or if you do not feel comfortable contacting your supervisor, contact the Legal Counsel. The Company may also establish other procedures for employees to seek help, including the use of an internal or third-party hotline service, and will inform employees of such alternatives as they become available. You may elect to remain anonymous and will not be required to reveal your identity in your communication to the Company.

### **Reporting Violations of the Code (only applicable to the extent permitted by applicable law)**

All employees have a duty to report any known or suspected violation of this Code, including any violation of any applicable laws, rules, or regulations, in compliance with applicable local laws, rules, or regulations. If you know of or suspect a violation of this Code, immediately report the conduct to your supervisor. Your supervisor will contact the Legal Counsel, who will work with you and your supervisor to investigate your concern. If you do not feel comfortable reporting the conduct to your supervisor or you do not get a satisfactory response, you may contact the Legal Counsel directly. Employees submitting this information need not leave their name or other personal information and reasonable efforts will be used to conduct the investigation that follows from the report from an employee in compliance with local laws and regulations and in a manner that protects the confidentiality and anonymity of the employee submitting the report.

All reports of known or suspected violations of the law or this Code will be handled sensitively and with discretion. Your supervisor, the Legal Counsel and the Company will protect your confidentiality to the extent possible, consistent with applicable law and the Company’s need to investigate your concern.

It is Company policy that any employee who violates this Code will be subject to appropriate discipline, which may include termination of employment. This determination will be based upon the facts and circumstances of each particular situation, and shall be subject to

the provisions of applicable law, rules and regulations of the jurisdiction relevant to an employee. An employee accused of violating this Code will be given an opportunity to present his or her version of the events at issue prior to any determination of appropriate discipline. Employees who violate the law or this Code may expose themselves to substantial civil damages or criminal charges. The Company may also face substantial fines and penalties and may incur damage to its reputation and standing in the community. Your conduct as a representative of the Company, if it does not comply with the law or with this Code, can result in serious consequences for both you and the Company.

### **Policy Against Retaliation**

The Company prohibits retaliation against an employee who, in good faith, seeks help or reports known or suspected violations. Any reprisal or retaliation against an employee because the employee, in good faith, sought help or filed a report will be subject to disciplinary action, including potential termination of employment.

### **Waivers of the Code**

Waivers of this Code for employees may be made only by an executive officer of the Company. Any waiver of this Code for the actions of our directors, executive officers or other principal financial officers may be made only by our board of directors, or a committee thereof, and will be disclosed to the public as required by law or applicable rules and regulations.

## **CONFLICTS OF INTEREST**

### **Identifying Potential Conflicts of Interest**

A conflict of interest can occur when an employee's private interest interferes, or appears to interfere, with the interests of the Company. You should avoid any private interest that influences or appears to influence your ability to act in the interests of the Company or that makes it difficult to perform your work objectively and effectively.

Identifying potential conflicts of interest may not always be clear-cut. The following is not intended to be a comprehensive list, but rather are basic tenets that would raise the specter of a conflict of interest:

- **Outside Employment.** Company employees have a primary business responsibility to the Company and should avoid any activity that may interfere, or have the appearance of interfering, with this responsibility. No employee should be employed by, serve as a director of, or provide any services to a company that is a material customer, supplier or competitor of the Company, as defined below.
- **Improper Personal Benefits.** No employee should obtain any material (as to him or her) personal benefits or favors because of his or her position with the Company. Please see "Gifts and Entertainment" below for additional guidance in this area.

- Financial Interests. No employee should have a significant financial interest (ownership or otherwise) in any company that is a material customer, supplier or competitor of the Company. A “significant financial interest” means (i) ownership of greater than 1% of the equity of a material customer, supplier or competitor or (ii) an investment in a material customer, supplier or competitor that represents more than 5% of the total assets of the employee.
- Loans or Other Financial Transactions. No employee should obtain loans or guarantees of personal obligations from, or enter into any other personal financial transaction with, any company that is a material customer, supplier or competitor of the Company. This guideline does not prohibit arms-length transactions with banks, brokerage firms or other financial institutions.
- Service on Boards and Committees. No employee should serve on a business advisory board, board of directors or trustees or on a committee of any entity (whether profit or not-for-profit) whose interests reasonably would be expected to conflict with those of the Company or otherwise provide advice on a continuing basis for such entity, unless they have prior written permission from Company management.
- Lectures and Presentations. Employees may not give or participate in any speaking engagement outside of the Company on any subject that relates to the Company’s business or their work for the Company without the prior approval of their supervisors. Employees may not submit articles for publication that contain information involving the Company without prior approval of their supervisors. It is the supervisor’s responsibility to obtain clearance from (senior) management as appropriate.
- Actions of Family Members. The actions of family members outside the workplace may also give rise to the conflicts of interest described above because they may influence an employee’s objectivity in making decisions on behalf of the Company. For purposes of this Code, “family members” include your spouse or life-partner, brothers, sisters and parents, in-laws and children whether such relationships are by blood or adoption.

For purposes of this Code, a company is a “material” customer if the company has made payments to the Company in the past year in excess of US\$100,000 or 2% of the customer’s gross revenues, whichever is greater. A company is a “material” supplier if the company has received payments from the Company in the past year in excess of US\$100,000 or 2% of the supplier’s gross revenues, whichever is greater. A company is a “material” competitor if the company competes in the Company’s line of business and has annual gross revenues from such line of business in excess of US\$1,000,000. If you are uncertain whether a particular company is a material customer, supplier or competitor, please contact the Legal Counsel for assistance.

### **Disclosure of Conflicts of Interest**

The Company requires that employees disclose any situations that reasonably would be expected to give rise to a conflict of interest. If you suspect that you have a conflict of interest, or something that others could reasonably perceive as a conflict of interest, you must report it to your supervisor or the Legal Counsel. Your supervisor and the Legal Counsel will work

with you to determine whether you have a conflict of interest and, if so, how best to address it. Although conflicts of interest are not automatically prohibited, they are not desirable and may only be waived as described in “Waivers of the Code” above.

## **CORPORATE OPPORTUNITIES**

As an employee of the Company, you have an obligation to advance the Company’s interests when the opportunity to do so arises. If you discover or are presented with a business opportunity through the use of corporate property, information or because of your position with the Company, you should first present the business opportunity to the Company before pursuing the opportunity in your individual capacity. No employee may use corporate property, information or his or her position with the Company for personal gain and no employee should compete with the Company.

You should disclose to your supervisor the terms and conditions of each business opportunity covered by this Code that you wish to pursue. Your supervisor will contact the Legal Counsel and the appropriate management personnel to determine whether the Company wishes to pursue the business opportunity. If the Company waives its right to pursue the business opportunity, you may pursue the business opportunity on the same terms and conditions as originally proposed and consistent with the other ethical guidelines set forth in this Code.

## **CONFIDENTIAL INFORMATION**

Employees have access to a variety of confidential information while employed at the Company. Confidential information includes all information that is internally generated by the Company concerning the business of the Company. It may also include information obtained from sources outside the Company, including information about other companies or their securities or even information regarding the Company’s partners, customers or suppliers. Confidential information includes all non-public information that might be of use to competitors, or, if disclosed, harmful to the Company or its customers.

The following types of information and documents are examples of information considered highly confidential and should be safeguarded to ensure access is only provided for authorized business use (note that this is not intended to be an exhaustive list):

- Intellectual property
- Commercial relationships
- Contracts
- Customers
- Proposed trademarks
- Patent applications
- Audit reports
- Non-public financial information
- Business and technology reports
- Memoranda, correspondence and internal records of the organization
- Research ideas or product designs

- Business strategy and plans
- Collaborations with other companies and the information learned through these relationships
- All personnel information, including names, addresses, home telephone numbers, payroll records, number of stock options held, benefit plans and medical records, unless such disclosure is required by law.

Employees have a duty to safeguard all confidential information of the Company or third parties with which the Company conducts business, except under controlled circumstances with prior management approval. An employee's obligation to protect confidential information continues after he or she leaves the Company. Unauthorized disclosure of confidential information could cause competitive harm to the Company or its customers and could result in legal liability to you and the Company.

Employees should not discuss confidential information with anyone outside the Company except under controlled circumstances with prior management approval. Any questions or concerns regarding whether disclosure of Company information is legally mandated should be promptly referred to the Legal Counsel.

### **Safeguarding Confidential Information**

Care must be taken to safeguard confidential information. Accordingly, the following measures should be adhered to:

- The Company's employees should conduct their business and social activities so as not to risk inadvertent disclosure of confidential information. For example, when not in use, confidential information should be secretly stored. Also, review of confidential documents or discussion of confidential subjects in public places (e.g., airplanes, trains, taxis, etc.) should be conducted so as to prevent overhearing or other access by unauthorized persons.
- Within the Company's offices, confidential matters should not be discussed within hearing range of visitors or others not working on such matters.
- Confidential matters should not be discussed with other employees not working on such matters or with friends or relatives including those living in the same household as a Company employee.
- Any consultants or experts who are used to facilitate review of business transactions or assist the organization in its business activities should be subject to a confidentiality agreement before any exchange of information takes place. Furthermore, employees should limit the disclosure of information to these entities to only that which is within the scope of the confidentiality agreement and only to the extent needed to complete their particular task.

### **COMPETITION AND FAIR DEALING**

All employees are obligated to deal fairly with fellow employees and with the Company's customers, suppliers, competitors and other third parties. Employees should not

take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation or any other unfair-dealing practice.

### **Relationships with Customers**

Our business success depends upon our ability to foster lasting customer relationships. The Company is committed to dealing with customers fairly, honestly and with integrity. Specifically, you should keep the following guidelines in mind when dealing with customers:

- Information we supply to customers should be accurate and complete to the best of our knowledge. Employees should not deliberately misrepresent information to customers.
- Employees should not refuse to sell, service, or maintain products the Company has produced simply because a customer is buying products from another supplier.
- Customer entertainment should not exceed reasonable and customary business practice. Employees should not provide entertainment or other benefits that could be viewed as an inducement to or a reward for, customer purchase decisions. Please see “Gifts and Entertainment” below for additional guidelines in this area.

### **Relationships with Suppliers**

The Company deals fairly and honestly with its suppliers. This means that our relationships with suppliers are based on price, quality, service and reputation, among other factors. Employees dealing with suppliers should carefully guard their objectivity. Specifically, no employee should accept or solicit any personal benefit from a supplier or potential supplier that might compromise, or appear to compromise, their objective assessment of the supplier’s products and prices. Employees can give or accept promotional items of nominal value or moderately scaled entertainment within the limits of responsible and customary business practice. Please see “Gifts and Entertainment” below for additional guidelines in this area.

### **Relationships with Competitors**

The Company is committed to free and open competition in the marketplace. Employees should avoid actions that would be contrary to laws governing competitive practices in the marketplace, including U.S. federal and state as well as European antitrust laws and other applicable laws of other jurisdictions. Such actions include misappropriation and/or misuse of a competitor’s confidential information or making false statements about the competitor’s business and business practices.

## **PROTECTION AND USE OF COMPANY ASSETS**

Employees should protect the Company’s assets and ensure their efficient use for legitimate business purposes only. Theft, carelessness and waste have a direct impact on the

Company's profitability. The use of Company funds or assets, whether or not for personal gain, for any unlawful or improper purpose is prohibited.

To ensure the protection and proper use of the Company's assets, each employee should:

- Exercise reasonable care to prevent theft, damage or misuse of Company property.
- Report the actual or suspected theft, damage or misuse of Company property to a supervisor.
- Use the Company's telephone system, other electronic communication services, written materials and other property for business-related purposes only unless personal use is expressly authorized by the Company.
- Safeguard all electronic programs, data, communications and written materials from inadvertent access by others.
- Use Company property only for legitimate business purposes, as authorized in connection with your job responsibilities.

Employees should be aware that Company property includes, in addition to all written communications, all data and communications transmitted or received to or by, or contained in, the Company's electronic or telephonic systems. Employees and other users of this property should have no expectation of privacy with respect to these communications and data, subject to mandatory provisions of law. To the extent permitted by applicable law, the Company has the ability, and reserves the right, to monitor all electronic and telephonic communication. These communications may also be subject to disclosure to law enforcement or government officials to the extent permitted by applicable law. By making private use of the Company's applications and systems, employees consent that the Company may constrain certain rights regarding data protection, secrecy of telecommunications and other privacy rights.

## **GIFTS AND ENTERTAINMENT**

The giving and receiving of gifts is a common business practice. Appropriate business gifts and entertainment can be welcome courtesies designed to build relationships and understanding among business partners. However, gifts and entertainment should not compromise, or appear to compromise, your ability to make objective and fair business decisions.

It is your responsibility to use good judgment in this area. As a general rule, you may give or receive gifts or entertainment to or from customers or suppliers only if the gift or entertainment is of nominal value, would not be viewed as an inducement to or reward for any particular business decision, and would not cause the Company embarrassment or adverse publicity. All gifts and entertainment expenses should be properly accounted for on expense reports. The following specific examples may be helpful:

- Meals and Entertainment. You may occasionally accept or give meals, refreshments or other entertainment if:
  - The items are of reasonable value;
  - The purpose of the meeting or attendance at the event is business related; and
  - The expenses would be paid by the Company as a reasonable business expense if not paid for by another party.

Entertainment of reasonable value may include food and tickets for sporting and cultural events if they are generally offered to other customers, suppliers or vendors.

- Advertising and Promotional Materials. You may occasionally accept or give advertising or promotional materials of nominal value.
- Personal Gifts. You may accept or give personal gifts of reasonable value that are related to recognized special occasions such as a graduation, promotion, new job, wedding, retirement or a public holiday. A gift is also acceptable if it is based on a family or personal relationship and unrelated to the business involved between the individuals.
- Gifts Rewarding Service or Accomplishment. You may accept a gift from a civic, charitable or religious organization specifically related to your service or accomplishment.
- Cash and Cash Equivalents. It is never acceptable to give or accept a gift in cash, credit or the equivalent.

You must also be particularly careful that gifts and entertainment are not construed as bribes, kickbacks or other improper payments under the specific laws of the jurisdictions of the countries in which you conduct business. Please see “Compliance with Laws and Regulations” below for additional guidance in this area.

You should make every effort to refuse or return a gift that is beyond these permissible guidelines. If it would be inappropriate to refuse a gift or you are unable to return a gift, you should promptly report the gift to your supervisor. Your supervisor will bring the gift to the attention of the Legal Counsel, which may require you to donate the gift to an appropriate community organization. If you have any questions about whether it is permissible to accept a gift or something else of value, contact your supervisor or the Legal Counsel for additional guidance.

## **COMPANY RECORDS**

Accurate and reliable records are important to our business. Our records are the basis of our earnings statements, financial reports and other disclosures to the public and guide our business decision-making and strategic planning. Company records include booking information, payroll, timecards, travel and expense reports, e-mails, accounting and financial

data, measurement and performance records, electronic data files and all other records maintained in the ordinary course of our business.

All Company records must not be misleading and must be complete, accurate and reliable in all material respects. Undisclosed or unrecorded funds, payments or receipts are inconsistent with our business practices and are prohibited. You are responsible for understanding and complying with our record keeping policy. Please ask your supervisor if you have any questions.

All Company records must be stored in a safe and secure location for the period of time required by law or Company policy. Old or unneeded records will be disposed of securely and in accordance with applicable document retention schedules or legal statutes.

Certain laws and regulations govern the proper retention of many categories of records and documents that are commonly maintained by companies. Any record, in paper or electronic format, relevant to a threatened, anticipated or actual internal or external inquiry, investigation, matter or lawsuit may not be discarded, concealed, falsified, altered, or otherwise made unavailable, once an employee has become aware of the existence of such threatened, anticipated or actual internal or external inquiry, investigation, matter or lawsuit. When in doubt regarding retention of any record, an employee must not discard or alter the record in question and should seek guidance from the Legal Counsel.

## **ACCURACY OF FINANCIAL REPORTS AND OTHER PUBLIC COMMUNICATIONS**

We are subject to various securities laws, regulations and reporting obligations which require the disclosure of accurate and complete information regarding the Company's business, financial condition and results of operations. Inaccurate, incomplete or untimely reporting by the Company or the assistance by the Company in inaccurate, incomplete or untimely reporting by a person outside the Company will not be tolerated and can severely damage the Company and result in legal liability.

The Company's principal financial officers and other employees working in the finance department have a special responsibility to ensure that all of our financial disclosures are full, fair, accurate, timely and understandable.

## **COMPLIANCE WITH LAWS AND REGULATIONS**

Each employee has an obligation to comply with all laws, rules and regulations applicable to the Company's operations. These include, without limitation, laws covering bribery and kickbacks, copyrights, trademarks and trade secrets, information privacy, insider trading, illegal political contributions, antitrust prohibitions, foreign corrupt practices, offering or receiving gratuities, environmental hazards, employment discrimination or harassment, occupational health and safety, false or misleading financial information or misuse of corporate assets. You are expected to understand and comply with all laws, rules and regulations that apply to your job position. If any doubt exists about whether a course of action is lawful, you should seek advice from your supervisor or the Legal Counsel.

ANY BUSINESS DEALINGS OR TRANSACTIONS (INCLUDING FREE TRIALS) WITH PERSONS OR ENTITIES IN THE FOLLOWING COUNTRIES ARE STRICTLY PROHIBITED – NO EXCEPTIONS. NO COMMISSIONS OR BONUSES WILL BE PAID FOR OR IN CONNECTIONS WITH SUCH DEALINGS OR TRANSACTIONS:

- CUBA
- BURMA/MYANMAR
- IRAN
- LIBYA
- NORTH KOREA
- SUDAN
- SYRIA
- THE CRIMEA, DONTESK, AND LUHANSK REGIONS OF UKRAINE
- ANY OTHER COUNTRY SUBJECT TO APPLICABLE EMBARGO, SANCTION, OR EXPORT PROHIBITION.

### **Antitrust/Competition Laws**

Most countries in which the Company does business have laws designed to regulate behavior that unreasonably restrains trade or unduly interferes with the action of the free market. These laws are generally called antitrust or competition laws and they apply to all agreements and relationships between competitors as well as to agreements and relationships with suppliers and customers. Anti-competitive behavior that is illegal under these laws can involve price fixing, kickbacks, rebates, boycotts, predatory pricing, stealing trade secrets, dividing markets, allocating customers, or entering into tying arrangements. It can also include resale price maintenance agreements, price discrimination, joint bidding arrangements, and other agreements that may, in some way, restrain commerce. Antitrust/anticompetition laws are vigorously enforced and include criminal and/or civil penalties.

### **Insider Trading**

Employees are prohibited, directly or indirectly through others, from trading in the Company's shares while in possession of material non-public information. Employees may not disclose material non-public information to anyone or even suggest to anyone that it might be a good time to buy or sell shares of the Company while in possession of material nonpublic information.

Material non-public information is anything that an employee learned in connection with work for the Company that has not been revealed publicly but may be considered important by investors when making investment or trading decisions. Examples of material non-public information include (but are not limited to):

- Information that the Company is about to win or lose a large contract
- Information that the Company is about to announce a major change in strategy or an important new product

- Information that the Company is about to acquire a company or sell a division or product
- Information about quarter-end or year-end financial data
- Information that the Company is about to repurchase shares, change dividend policies, or announce a share split
- Information about developments in lawsuits or regulations that will significantly impact the Company
- Any similar information about a customer, supplier or other business partner of the Company, such as information about an impending joint venture.

It is material non-public information even if the information is discovered by accident.

Employees having access to material non-public information should consult with the Legal Counsel before making any trades or sharing any information.

### **Dealings with Government Officials**

All dealings with government officials, including but not limited to, lobbying meetings with governmental agencies, contributions to candidates, communications with public officials, and contracting with government agencies must be done in accordance with all applicable laws, rules and regulations. Government officials include officials or employees of federal, state, provincial, county, municipal, and similar officials of any government or any department or agency thereof; any officers or employees of a company or business owned in whole or in part by a government (“state-owned enterprise”); any officers or employees of a public international organization (for example, the World Bank, United Nations, or the European Union); any foreign political party or official thereof; or any candidate for political office. Government officials include officials at every level of government, regardless of rank or position. No employee may offer or promise a payment or reward of any kind, directly or indirectly to any governmental official on any level in order to secure preferential treatment for the Company or any of its employees.

The U.S. Foreign Corrupt Practices Act (the “**FCPA**”) and the UK Anti-Bribery Act (the “**UKAB**”) are examples of laws that specifically prohibit the Company and its employees and agents from offering or giving money or any other item of value to win or retain business or to influence any act or decision of any governmental official as defined above, political party or candidate for political office. Stated more concisely, the FCPA and the UKAB prohibit the payment of bribes, kickback or other inducements to foreign officials as defined above. This prohibition also extends to payments to a sales representative or agent if there is reason to believe that the payment will be used indirectly for a prohibited payment to foreign officials. Violation of the FCPA and/or the UKAB are a crime that can result in severe fines and criminal penalties, as well as disciplinary action by the Company, up to and including termination of employment. The FCPA and the UKAB can apply even to employees and business transactions in Spain or other countries outside of the US or UK.

The Company is committed to the communities in which it does business and permits

reasonable donations to local and foreign charities. Donations only may be given to bona fide charities and used for proper charitable purposes and may not be misapplied in violation of the Code.

## **PUBLIC COMMUNICATION**

The Company places a high value on its credibility and reputation in the community. What is written or said about the Company in the news media and investment community directly impacts our reputation, positively or negatively. Our policy is to provide timely, accurate and complete information in response to public requests (from the media, analysts, etc.), consistent with our obligations to maintain the confidentiality of competitive and proprietary information. To ensure compliance with this policy, all news media or other public requests for information regarding the Company should be directed to the Chief Executive Officer or persons designated by the Chief Executive Officer (collectively, the “**Media Contacts**”). The Media Contacts will work with you and the appropriate personnel to evaluate and coordinate a response to the request.

## **CONCLUSION**

This Code of Business Conduct and Ethics contains general guidelines for conducting the business of the Company consistent with the highest standards of business ethics. If you have any questions about these guidelines, please contact your supervisor or the Legal Counsel. We expect all Company employees, to adhere to these standards. This Code of Business Conduct and Ethics is not intended to restrict communications or actions required or protected under state or federal law.

This Code and the matters contained herein are neither a contract of employment nor a guarantee of continuing Company policy. We reserve the right to amend, supplement or discontinue this Code and the matters addressed herein, without prior notice, at any time.

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### Acknowledgement of Receipt and Review

I, \_\_\_\_\_ (employee name), acknowledge that on \_\_\_\_\_ (date), I received and read a copy of Devo's Code of Business Conduct and Ethics and understand that it is my responsibility to be familiar with and abide by its terms. This Code of Business Conduct and Ethics is not promissory and does not set terms or conditions of employment or create an employment contract.

\_\_\_\_\_

Employee Signature