

THIRD PARTY CODE OF CONDUCT

1. POLICY PURPOSE

Real Chemistry LLC (“Real Chemistry”) is committed to the highest standards of ethical conduct and social and environmental responsibility. Therefore, we also expect the same of the people and organizations we work with. We expect all outside entities we conduct business with (independent contractors, vendors, partner agencies, etc., (individually “Third Party”, collectively “Third Parties”), to

- (i) also aspire to these same standards in their business operations and
- (ii) have their own documented policies and processes in place to address the matters detailed herein.

We expect the Third Parties we work with to uphold standards that are substantially similar to Real Chemistry. Accordingly, Real Chemistry has created this Third Party Code of Conduct (the “Third Party Code of Conduct”) to set out the standards Real Chemistry expects of any Third Party we engage in business with.

2. SECURITY AND PRIVACY

Third Parties must comply with all applicable privacy and data protection laws and regulations in the countries they operate in, as well as comply with all information security laws, regulations, industry standards, and the minimum security requirements annotated in Annex I. Third Parties shall comply with all applicable privacy, data protection, and information security laws and regulatory and judicial requirements regarding the collection, storage, processing, transmission, or disclosure of Real Chemistry data.

Third Parties must secure Real Chemistry’s confidential data and individual personal data and prohibit unauthorized access or use.

3. ETHICAL STANDARDS

(a) General Guidelines

Real Chemistry seeks to partner only with Third Parties that conduct business with ethical standards consistent with its own. As such, Third Parties should abide by the following ethical standards and guidelines:

- Obey all relevant laws of their jurisdiction
- Treat people (in and outside of the organization) fairly, with dignity and respect
- Prepare and maintain all records of financial transactions in a careful and accurate manner

- Report financial conditions and results of operations in an honest and prompt manner
- Deal honestly and fairly with clients, customers, vendors, financial partners and other third parties
- Avoid actual, potential and reasonably perceived conflicts of interest
- Avoid gifts that are given or received improperly
- Safeguard all Real Chemistry's assets
- Protect Real Chemistry's reputation
- Separate personal political or religious activities from Real Chemistry's business
- Report violations of legal and ethical standards

(b) Conflicts of Interest

Real Chemistry employees are not permitted to accept gifts, gratuities or excessive entertainment (i.e., beyond nominal, conventional business courtesies, such as an occasional luncheon) from any individual or organization with which Real Chemistry has business dealings. Therefore, Third Parties shall refrain from giving any gifts, favors, payments or the like that would, or could be reasonably perceived to violate this policy. Similarly, Third Parties should also refrain from accepting or giving any gifts, favors, payments, entertainment, loans or the like with a purpose of obtaining any improper advantage or influence for the Third Party, Real Chemistry or any client (prospective or current) or any other activity that creates any appearance of impropriety (actual or perceived).

Third Party must disclose all potential conflicts of interest, including those in which Third Party may have been placed inadvertently due to either business or personal relationships with customers, vendors, business associates, or competitors of Real Chemistry, or with other Real Chemistry employees.

Notably, Third Party employees may not act on Real Chemistry's behalf in any transaction or business relationship that involve themselves or members of their family, or other persons or organization with which they or their family have any significant personal connection or financial interest.

(c) Insider Trading

It is prohibited for Third Parties or its employees, agents, operatives to purchase or sell securities while in possession of material non-public information that was acquired by virtue of their relationship with Real Chemistry. It is also prohibited to communicate material, non-public information to others, whether expressly or by way of making a recommendation for the purchase or sale of such securities based upon that information.

(d) Fraud and Investigations

Third Parties are expected to fully and promptly cooperate with Real Chemistry's investigators, law enforcement and regulatory agencies in the event of any investigation of wrongdoing or involvement by a Third Party or its agents.

Should a Third Party receive any subpoenas, regulatory requests, media inquiries, or other third-party requests related to its relationship, work, or services with Real Chemistry, the Third Party shall promptly forward such matter to Real Chemistry, to the extent permitted to do so by law.

4. ENVIRONMENTAL, SOCIAL AND GOVERNANCE

(a) Sustainability

Real Chemistry has made a commitment to climate action in the core of all areas of our business. Real Chemistry considers the climate crisis to be a universal, apolitical humanitarian crisis and thus, is committed to operating a responsible and sustainable business model. Thus, Real Chemistry also expects all Third Parties to also conduct business in a responsible manner that incorporates sustainability goals into operations and other business relationships. To further these goals, Third Parties are expected to demonstrate that they have policies and strategies to identify, prevent, mitigate, and account for the environmental impacts of their own operations and their supply base. All Third Parties shall comply with all applicable environmental laws, regulations and standards.

(b) Social Impact

Real Chemistry champions belonging and inclusion among our personnel. As such, Real Chemistry also promotes economic inclusions of diverse businesses in our supply chain. Real Chemistry encourages each Third Party to intentionally partner with local governments and communities to improve the educational, cultural, economic, and social well-being of the communities in which they live and serve. Third Parties are encouraged to support diversity efforts by utilizing diverse business

in its operations. As such, each Third Party may be asked to provide quarterly spend reports that reflect the intentional measures taken to provide a positive social impact.

(c) Governance

Upon request, Third Party will provide written information on its policies and practices related to compliance with this Third Party Code of Conduct through use of assessments and questionnaires. Real Chemistry is committed to working with Third Parties to ensure performance and compliance with this Third Party Code of Conduct. If any Third Party is found to be non-compliant or in violation of this Code of Conduct, Real Chemistry may give reasonable notice to respond with proposed corrective actions, unless the violation is severe or incurable, or in violation of the law. Real Chemistry may suspend or terminate its relationship with any Third Party if there is a violation of law and/or disclose the matter to the appropriate authorities.

5. HUMAN RIGHTS AND STANDARDS

(a) Non- Discrimination and Harassment

Real Chemistry does not tolerate any form of discrimination against individuals and explicitly **prohibits unlawful discrimination** based on race, color, religion, national origin, ancestry, sex, sexual orientation, gender identity and expression, pregnancy (including childbirth, lactation, and pregnancy-related medical conditions), marital status, parental status, age, physical or mental disability, height, weight, genetic information (including characteristics and testing), protected veteran status, or any other consideration made unlawful by applicable federal law, state law, or local law or ordinance.

Real Chemistry is **committed to a harassment-free work environment for everyone**. This includes harassment based on race, color, religion, national origin, ancestry, sex, sexual orientation, gender identity and expression, pregnancy (including childbirth, lactation, and pregnancy related medical conditions), marital status, parental status, age, physical or mental disability, height, weight, genetic information (including characteristics and testing), protected veteran status, or any other consideration made unlawful by applicable federal law, state law, or local law or ordinance. This includes any harassment based on the perception that an individual possesses any of these characteristics or is associated with a person who possesses, or is perceived as possessing, any of these characteristics.

Real Chemistry has a zero-tolerance policy for sexual harassment, in any form. Sexual harassment is generally defined as unwelcomed sexual advances, requests

for sexual favors, or other visual, verbal or physical conduct of a sexual nature when: (i) submission to such conduct is made, either explicitly or implicitly, a term or a condition of employment; (ii) submission to or rejection of such conduct affects employment opportunities; or (iii) such conduct interferes with an individual's work or creates an intimidating, hostile, or offensive work environment. Examples of sexual harassment include, but are not limited to: sexual gestures, leering, or displaying sexually suggestive objects or pictures; derogatory comments, epithets, slurs, teasing and jokes of a sexual nature; graphic comments about an individual's sex life or body; suggestive or obscene letters, e-mails, notes or invitations; and unwelcome physical contact.

If any Third Party or any of its agents is found to be furthering, encouraging or involved in any level of harassment (sexual or otherwise), Real Chemistry may give reasonable notice to respond with proposed corrective actions, unless the violation is severe or incurable, or in violation of the law. Real Chemistry may suspend or terminate its relationship with any Third Party if there is a violation of law and/or disclose the matter to the appropriate authorities.

(b) Labor and Employment Practices

All Third Parties must adopt sound labor and employment practices and treat their workers fairly in accordance with local laws and regulations, including compensation, leave, and benefits. Third Parties shall maintain fair and non-discriminatory work environments in a manner that comports not only with workplace practices mandated by state and federal laws but also with Real Chemistry's commitment to the highest ethical standards in all aspects of its mission and business practices, including employment.

Each Third Party is expected to conduct proper and adequate checks on any agency or company providing labor, employees, contractors, or other persons, to ensure that each agency or company does not engage in any improper or illegal labor and employment practices.

(c) Occupational Health and Safety Practices

All Third Parties must provide their employees with a safe and healthy working environment to prevent accidents and injury arising out of, related to, or occurring in the course of work or as a result of the operations in accordance with the Occupational Safety and Health Act, and other applicable state laws, local laws or ordinances.

6. COMPLIANCE

(a) Communication

Third Parties are expected to take appropriate actions to ensure the Third Party Code of Conduct and its expectations are communicated to their employees, contractors, and throughout their own supply chain.

(b) Enforcement

If Real Chemistry determines that any Third Party has violated this Code of Conduct (whether intentionally or unintentionally), Real Chemistry may terminate the business relationship or require the Third Party to implement an immediate corrective action plan. If corrective action is advised, but the Third Party refuses to implement, Real Chemistry will suspend pending services and will terminate the business relationship, effective immediately.

7. REPORTING CONCERNS

Real Chemistry encourages its employees and any other Third Party involved with Real Chemistry business to report any concerns, actual, or suspected, material violations of law or any other whistleblower matters. All concerns should be reported to Real Chemistry's Legal Department at: legal@realchemistry.com. Additionally, Real Chemistry has a whistleblower hotline, Speak Up, that permits anyone to submit a confidential or anonymous report on matters of concern at: <https://speakup.realchemistry.com>. All reports submitted on the Speak Up Hotline go directly to Legal and HR Leadership.

8. CHANGES/UPDATES TO THE VENDOR CODE OF CONDUCT

Real Chemistry may revise or update the Third Party Code of Conduct, in its sole discretion, from time to time without notice.

ANNEX 1

THIRD PARTY: MINIMUM SECURITY REQUIREMENTS

Considering the state of the art, the costs of implementation and the nature, scope, context and purposes of processing of data, each Third Party shall implement appropriate technical and organizational measures to ensure a level of security appropriate to the risk and that are no less stringent than the below when accessing or processing Real Chemistry sensitive/non-public data or systems.

Access Control:

- Implement Role-Based Access Control (RBAC) to ensure that only authorized personnel have access to sensitive systems and data.
- Conduct regular reviews of user access rights and revoke access for terminated employees or those who change roles in no more than 24 hours.
- Conduct quarterly reviews of users with elevated privileges and promptly revoke access for terminated employees or those who change roles in no more than 12 hours.
- Multifactor authentication (MFA) implemented to access any system / data / network from public IP space.

Data Encryption:

- Use strong Federal Information Processing Standards (FIPS) approved encryption protocols for data at rest and in transit.
- Ensure that encryption keys are stored securely and access to them is restricted.

Network Security:

- Utilize firewalls, intrusion detection/prevention systems (IDS/IPS), and secure VPNs to protect network traffic.
- Regularly update and patch network devices and software to defend against vulnerabilities.

Software Security:

- Follow secure coding practices (e.g., OWASP) and perform regular security testing, including static and dynamic analysis, dependency scanning, threat modeling, and code reviews.
- Have separate environments for production and development, Quality Assurance (QA), and testing.

- Production data will not be used for development, QA, or testing purposes, or in any of those environments.
- Changes will be documented and approved by appropriate personnel before implementation.
- Apply patches and updates to all software components promptly to mitigate known vulnerabilities.

Incident Response:

- Develop and maintain an incident response plan that includes procedures for identifying, responding to, and recovering from security incidents.
- Conduct regular incident response drills to ensure preparedness and effectiveness.
- If Real Chemistry data or systems that process Real Chemistry data are suspected of access or alteration by someone other than approved parties, Third Party will notify Real Chemistry without undue delay.

Data Protection and Privacy:

- Implement measures to comply with applicable data protection laws and regulations (e.g., GDPR, CCPA).
- Ensure that data collection, storage, and processing practices are transparent and respect the privacy rights of individuals.

Training and Awareness:

- Provide ongoing security training and awareness programs for all employees to help them recognize and avoid security threats.
- Provide ongoing training for employees with elevated privileges and employees who do development work/code.
- Encourage a culture of security awareness and responsibility across the organization.

Supplier Risk Management:

- Conduct thorough due diligence and security assessments of all other third-party vendors and service providers.
- Require any party in its supply chain to adhere to equivalent security standards and include security requirements in the contracts with Real Chemistry.

Physical Security:

- Implement physical security controls to protect facilities and data centers from unauthorized access.

- Use access logs, CCTV surveillance, and security personnel to monitor and secure premises.

Logging, Monitoring, and Auditing:

- Maintain detailed logs of systems and network activity, access attempts, and data processing events.
- Continuously monitor systems and networks for suspicious activities, and alert to any anomalous activities.
- Log retention policies are defined, and logs are retained for no less than 90 days.

Business Continuity and Disaster Recovery:

- Develop and maintain a business continuity and disaster recovery plan to ensure the availability of critical services and data.
- Regularly test and update the plan to address new threats and changing business needs.

Secure System Configuration:

- Follow industry good practices for the secure configuration of systems, applications, network devices, and software development, such as NIST, ISO, or SOC.
- Remove or disable unnecessary services and accounts to minimize attack surfaces.