



CODE OF

BUSINESS ETHICS

Integrity in business. Respect for people. Trust in technology and information.



HOW WE DO BUSINESS MATTERS

At VelocityEHS, trust is earned through the way we act. This Code sets out the standards we hold ourselves to as we serve customers, work with partners, support our people, and use technology and information responsibly. We conduct business ethically, professionally, fairly, and with integrity. We comply with applicable laws and regulations, honor our contractual commitments, protect the people and information entrusted to us, and expect comparable standards from those who work with us.

Who is this Code For?

This Code of Business Ethics (**"Code"**) explains how VelocityEHS conducts business and the standards that apply to people acting on our behalf. It applies to VelocityEHS Holdings, Inc. (**"VelocityEHS" or "Company"**), its controlled affiliates, and our directors, officers, employees, and contractors when they act on behalf of VelocityEHS.

We also expect suppliers, vendors, partners, agents, consultants, and other third parties working with or for VelocityEHS to uphold ethical standards materially consistent with this Code, as applicable to their respective industries, the jurisdictions in which they operate, and their contractual obligations.

This Code sets out shared principles. It does not replace more specific Company policies, customer agreements, data processing terms, employment requirements, or legal obligations. When a law, contract, or Company policy sets a higher or more specific standard, that standard controls.

VelocityEHS | 2026

AT A GLANCE

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A SIMPLE TEST

Before acting, ask: Is it legal? Is it consistent with our values and policies? Does it protect customers, colleagues, and the Company? Would I be comfortable if the decision were publicly known? If the answer is unclear, stop and ask for guidance.

SECTION 01: PURPOSE, SCOPE & PERSONAL RESPONSIBILITY

The Standards We Hold

We all help shape how VelocityEHS works and does business. We strive to create a cooperative, professional environment where people act with dignity, take responsibility for their actions, meet business objectives responsibly, and treat others with respect.

Our Commitments and Responsibilities

Ethical conduct is a shared responsibility. It is also fundamental to earning the trust of our employees, customers, partners, suppliers, regulators, and communities.

Everyone covered by this Code is expected to:

- Know and follow the laws, regulations, Company policies, and contractual requirements that apply to their work.
- Act honestly, professionally, fairly, and with integrity in business dealings and relationships.

- Protect confidential, personal, proprietary, and customer information and use it only for authorized purposes.
- Avoid actual, potential, or perceived conflicts of interest and promptly disclose concerns.
- Raise questions and report suspected misconduct in good faith.
- Cooperate honestly with investigations, audits, and compliance activities.
- Complete required training and certifications and seek guidance when uncertain.

Leaders Set the Tone

Managers and leaders have additional responsibilities. They are expected to model ethical behavior, make compliance part of everyday decisions, create an environment where people can raise questions without fear, respond appropriately to concerns, ensure personnel receive relevant training, and escalate issues to Human Resources, Legal, Compliance, Security, or another appropriate function.

SECTION 02: INTEGRITY IN BUSINESS

We Do Business the Right Way

We demonstrate integrity in everyday decisions: following the rules that apply, competing fairly, keeping accurate records, and never using improper influence to gain an advantage.

We Follow the Requirements That Apply

VelocityEHS conducts its business ethically and in a way that is consistent with applicable legal requirements, regulations, standards, guidelines, best practices, and other requirements in the jurisdictions where we operate. We expect the same commitment from employees, contractors, suppliers, partners, and other representatives acting on our behalf.

Requirements can differ across jurisdictions. We follow the requirement that applies to the activity and ask for guidance when obligations conflict or are unclear. **Nothing in this Code authorizes conduct prohibited by applicable law.**

We Do Not Tolerate Bribery or Corruption

We earn business through the quality and competitiveness of our products and services, not through improper influence. VelocityEHS has zero tolerance for bribery and corruption.

- People acting on behalf of VelocityEHS must not offer, promise, authorize, give, request, agree to receive, or accept a bribe, kickback, secret commission, improper payment, or other improper advantage.
- We do not use agents, consultants, distributors, partners, suppliers, or other third parties to do anything we could not lawfully or ethically do ourselves.
- We do not make facilitation or grease payments. If a demand is accompanied by an imminent threat to health or safety, people acting on our behalf are expected to prioritize personal safety and report the incident promptly to Legal or Compliance.
- People acting on our behalf must use heightened care in dealings with government officials, state-owned entities, healthcare institutions, public-sector customers, and anyone who may be treated as a public official under applicable law.
- We maintain complete and accurate records of payments, expenses, gifts, hospitality, discounts, rebates, commissions, and other transfers of value.

VelocityEHS does not engage in anti-competitive or antitrust practices. We compete on the merits and do not enter into agreements or understandings with competitors to fix prices, allocate customers or markets, rig bids, restrict output, coordinate hiring or compensation unlawfully, or otherwise reduce competition.

Competitive information must be obtained lawfully and ethically. Do not seek or use a competitor's confidential information improperly, and do not misrepresent who you are or why you are requesting information.

We Put the Company and Our Customers First

We make business decisions in the best interests of VelocityEHS and our customers, not for improper personal benefit. Employees and representatives must avoid, disclose, and appropriately resolve actual, potential, or perceived conflicts of interest.

Potential conflicts of interest may include:

- Outside employment, consulting, board service, investments, or other activities that compete with VelocityEHS or interfere with job responsibilities.
- Providing services to, or receiving material benefits from, a customer, supplier, partner, or competitor where the relationship could influence business judgment.
- Using Company time, equipment, confidential information, opportunities, or relationships for outside work or personal gain.
- Participating in decisions involving relatives, household members, close personal relationships, or entities in which the employee or representative has a financial interest.
- Soliciting VelocityEHS customers or employees for an outside business in a way that conflicts with Company interests or obligations.

Employees and representatives are expected to disclose potential conflicts promptly to their manager, Human Resources, Legal, or Compliance. Disclosure does not necessarily mean an activity is prohibited; it allows VelocityEHS to assess and manage the risk.

We Keep Business Courtesies Appropriate

Reasonable business courtesies may support legitimate business relationships, but they must never be used to improperly influence a decision or create an obligation. Gifts, meals, entertainment, travel, charitable contributions, sponsorships, or anything else of value must be lawful, reasonable, transparent, infrequent, appropriately documented, and consistent with Company approval requirements and the recipient organization's rules.

Cash, cash equivalents, personal loans, or anything intended to secure an improper advantage are prohibited. Extra caution and pre-approval may be required for anything involving a government official or public-sector entity.

We Guard Against Financial Misconduct

VelocityEHS does not engage in money laundering or related unlawful financial activity. We conduct business with legitimate customers and counterparties, use approved payment channels, and remain alert to unusual requests, payment structures, ownership arrangements, or transactions that lack a clear business purpose. Suspected fraud, false billing, theft, embezzlement, falsification of records, or other dishonest activity must be reported promptly.

We Follow Trade Rules

We comply with applicable export controls, economic sanctions, trade restrictions, and licensing requirements, including restrictions that may apply to countries, territories, end users, products, software, technology, and services. Employees involved in international sales, contracting,

technology transfers, travel, or data access must follow required screening and approval procedures and seek guidance when a transaction presents elevated risk.

We Keep Honest, Accurate Books and Records

Business records must be accurate, complete, timely, and not misleading. No one acting on behalf of VelocityEHS may create false or artificial entries, conceal the true nature of a transaction, falsify time or expense records, omit material information, or circumvent accounting, procurement, contracting, approval, or internal-control processes. We retain and dispose of records in accordance with applicable law, contractual obligations, and Company retention requirements.

SECTION 03: RESPECT FOR PEOPLE

We Put People First

People should be able to contribute fully in an environment where they are treated with dignity and respect, have equal opportunities, and can work safely. We are committed to helping create that environment.

We Create an Environment Where People Can Contribute

VelocityEHS is committed to an environment where people are treated with respect and dignity, can contribute fully, and have equal opportunities. We do not tolerate discrimination, unlawful harassment, sexual harassment, bullying, intimidation, retaliation, hate speech, threats, or other conduct that creates an unlawful or hostile work environment.

Employment and business decisions should be based on legitimate job-related and business-related factors, consistent with applicable law. We respect the individuality, viewpoints, beliefs, experiences, and legally protected rights of our colleagues and business partners.

We Respect Labor and Human Rights

VelocityEHS supports internationally recognized human rights and complies with applicable labor and employment laws in the markets where we operate. Our principles include preventing forced labor, modern slavery, human trafficking, and child labor; supporting non-discrimination; respecting lawful freedom of association and collective bargaining; and maintaining fair and lawful working conditions.

We expect suppliers and other business partners to comply with applicable labor and human-rights laws and to maintain practices designed to prevent modern slavery and human trafficking in their operations and supply chains.

We Put Health, Safety, and Workplace Security First

Nobody should be at greater risk because they work for us. We are committed to eliminating or reducing risks of serious harm, maintaining a safe and healthy workplace, and conducting our activities so they do not create unreasonable risks for employees, customers, visitors, suppliers, or the public.

- Follow applicable health and safety rules, training, and procedures.
- Report injuries, incidents, hazards, unsafe conditions, and credible threats promptly.
- Never engage in violence, threats of violence, intimidation, sabotage, or other conduct that endangers others.

- Report to work fit for duty and comply with applicable substance-use and workplace-safety requirements.
- Stop and ask for help if you are unsure how to perform work safely.

SECTION 04: TRUST IN TECHNOLOGY AND INFORMATION

We Protect the Trust Placed in Us

People trust us with information, technology, and decisions that matter. We protect that trust by using data, systems, intellectual property, and AI responsibly.

We Use Personal Information Responsibly

VelocityEHS is committed to privacy and data protection. We process personal information in accordance with applicable privacy and data protection laws, our Privacy Policy and Notice at Collection, applicable customer agreements, and our Data Processing Addendum.

In practice, this means we:

- Collect and use personal information only for legitimate, authorized, and specified purposes.
- Limit access to personal information to people with a business need and appropriate authorization.
- Use reasonable data minimization, retention, and disposal practices consistent with law and contract.
- Honor applicable individual rights and support customers in fulfilling data-subject or consumer requests where required.
- Use approved safeguards for international transfers and onward transfers where required.
- Promptly report suspected loss, misuse, unauthorized access, disclosure, alteration, or destruction of personal information.

When VelocityEHS processes personal information on behalf of a customer, we follow the customer's documented instructions, the applicable agreement, and applicable law. We do not use identifiable customer personal data for unrelated purposes and we do not sell or share it where prohibited by contract or law.

We Protect Information & Systems

We protect the confidentiality, integrity, and availability of customer data, Company information, and systems through appropriate administrative, physical, and technical safeguards. Access is limited to authorized people with a legitimate business need. We require confidential information to be handled with at least reasonable care and in accordance with its sensitivity and classification.

- Use only approved systems, devices, software, accounts, and storage locations for Company and customer information.
- Protect passwords, authentication factors, access credentials, and devices from unauthorized use.
- Follow encryption, access-control, remote-access, and secure-transfer requirements.
- Do not disclose confidential information externally, or internally to people without a need to know, unless authorized or legally required.
- Report security incidents, suspected compromises, lost or stolen devices, phishing, malware, or unauthorized access immediately through approved channels.

We Respect Intellectual Property and Proprietary Rights

We respect intellectual property rights, including copyrights, trademarks, patents, trade secrets, software, documentation, and confidential know-how. Use third-party content only when properly licensed or otherwise authorized. Protect VelocityEHS intellectual property and customer intellectual property from unauthorized disclosure, copying, misuse, or infringement.

We Use AI Responsibly, With People in the Loop

VelocityEHS recognizes that artificial intelligence (“AI”) can increase productivity and foster innovation, but it must be used with care and appropriate human judgment. At VelocityEHS, AI must be used responsibly, securely, transparently, and in compliance with applicable law, contracts, and Company policy.

- Use only approved AI tools and follow applicable review, vendor-risk, security, and compliance requirements.
- Enter only the minimum information necessary and do not submit confidential, proprietary, personal, customer, or third-party restricted information unless the use is authorized and protected by approved safeguards.
- Do not use identifiable customer data to train, develop, enhance, or improve AI models except where expressly authorized and permitted by contract and applicable law.
- Review and validate AI-generated outputs before use. AI outputs may be incomplete, inaccurate, biased, or otherwise unsuitable and are not a substitute for appropriate professional judgment.
- Use human oversight for material decisions and comply with applicable transparency, disclosure, labeling, risk-management, and recordkeeping requirements for AI systems and AI-generated content.
- Report suspected harmful, discriminatory, deceptive, unsafe, or unauthorized AI use.

We Communicate Accurately and Protect Confidential Information

We expect communications made on behalf of VelocityEHS to be accurate, respectful, and professional. Only authorized personnel may speak on behalf of VelocityEHS or make commitments for the Company. We prohibit the disclosure of confidential, proprietary, non-public, customer, or personal information through social media, public presentations, online forums, or other communications.

When people acting on our behalf discuss VelocityEHS products or services in a context where their affiliation may not be obvious, we require transparency about their relationship with the Company. We do not permit false or misleading statements, misuse of third-party intellectual property, or implications that personal views are endorsed by the Company unless authorized.

SECTION 05: RESPONSIBLE PARTNERSHIPS AND SUSTAINABILITY

We Choose Partners with Intention and Act Responsibly

Who we work with, and how we operate, can affect people, communities, the environment, and the trust others place in VelocityEHS.

We Choose and Manage Third Parties Carefully

Third parties can create legal, ethical, privacy, security, human-rights, and reputational risks. We select and manage suppliers, vendors, partners, agents, consultants, contractors, and other service

providers using appropriate due diligence and risk-based review. Where relevant, agreements should require standards consistent with applicable law and VelocityEHS requirements.

- Use approved procurement, contracting, vendor-risk, and security-review processes.
- Assess relevant anti-corruption, sanctions, privacy, information-security, labor, human-rights, environmental, and financial risks.
- Do not engage a third party to circumvent this Code, Company policy, customer commitments, or law.
- Escalate concerns about a third party's conduct, ownership, business practices, or legal compliance.

We Consider the Wider Impact

VelocityEHS seeks to operate responsibly and to consider financial, environmental, and social impacts in our everyday work. We strive for continual improvement in environmental stewardship and performance, responsible procurement, employee health and safety, inclusion, human rights, ethical governance, and transparent reporting. We encourage suppliers, partners, and other stakeholders to support similar principles where appropriate.

SECTION 06: SPEAKING UP, INVESTIGATIONS, AND NON-RETALIATION

We Listen, Investigate, and Protect

Speaking up helps us address concerns early. We take good-faith concerns seriously and prohibit retaliation against people who raise them.

We Encourage Good-Faith Reporting

Anyone covered by this Code who knows of or reasonably suspects illegal, dishonest, unsafe, unethical, or non-compliant conduct is expected to raise the concern promptly. We do not require people to investigate the issue themselves or determine who is at fault before speaking up.

Employees may report concerns to their manager, Human Resources, Legal, Compliance, Security, or another appropriate leader or function. Employees may also use the Company's anonymous reporting channel where available. Suppliers and other external stakeholders should use the reporting or contact channels made available to them by VelocityEHS.

We Take Concerns Seriously

VelocityEHS takes reports seriously and will assess and investigate concerns in a fair, timely, and appropriate manner. Information will be shared on a need-to-know basis and confidentiality will be protected to the extent reasonably possible, consistent with a thorough investigation, corrective action, legal obligations, and the rights of the individuals involved.

We Prohibit Retaliation

VelocityEHS prohibits retaliation against anyone who raises a concern in good faith, requests an accommodation, reports suspected misconduct, seeks advice, or participates in an investigation or compliance process. Retaliation may include termination, demotion, reduced compensation, unfavorable assignments, threats, intimidation, harassment, discrimination, or other adverse treatment because a person raised or assisted with a concern.

Good-faith reporting does not require a concern to be substantiated. Knowingly making a false report, deliberately providing false information, or obstructing an investigation may itself violate this Code.

We Protect Legal Rights

Nothing in this Code is intended to restrict rights protected by applicable law. Individuals may report possible legal violations to government agencies, participate in government investigations or proceedings, make disclosures protected by whistleblower laws, discuss wages or working conditions where legally protected, and exercise other protected rights without prior Company authorization or notice. The Company will not retaliate for exercising such rights.

SECTION 07: ACCOUNTABILITY, GOVERNANCE, AND REVIEW

We Hold Ourselves Accountable

A strong ethics program depends on accountability, honest cooperation, appropriate corrective action, and a commitment to keep learning and improving.

We Apply Consequences When Standards Are Not Met

Violations of this Code, Company policies, contractual obligations, or applicable law may result in corrective action, up to and including termination of employment or engagement, subject to applicable law and Company policy. VelocityEHS may also take appropriate action with respect to suppliers, partners, or other third parties, including remediation, suspension, or termination of the relationship.

We Cooperate and Correct What Went Wrong

Everyone covered by this Code must cooperate honestly with authorized investigations, audits, risk assessments, and compliance reviews. When issues are identified, VelocityEHS will take appropriate corrective and preventive action. That action may include process changes, training, disciplinary action, contract remedies, control improvements, reporting to authorities where required, or other measures appropriate to the circumstances.

We Review, Learn, and Improve

VelocityEHS periodically reviews its ethics and compliance risks and related policies and seeks continual improvement. This Code may be updated to reflect changes in law, regulation, technology, business practices, contractual commitments, or Company operations.

WHEN IN DOUBT, ASK

No code can anticipate every situation. If you are unsure how this Code, another VelocityEHS policy, a customer commitment, or applicable law applies, seek guidance before acting. Ethical decisions are easier to make when questions are raised early.

Related VelocityEHS Standards

This Code should be read together with applicable VelocityEHS policies and agreements, including, as relevant, the Employee Handbook, Privacy Policy and Notice at Collection, Master Subscription & Services Agreement, Data Processing Addendum, information-security policies, anti-corruption requirements, procurement and vendor-risk procedures, and other region- or role-specific policies.

