
SYZYGY PLASMONICS
CODE OF CONDUCT

September 2023

Syzygy Plasmonics
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Re: Message to the employees, officers, vendors, and stakeholders of Syzygy Plasmonics

Dear Colleagues:

As Syzygy Plasmonics continues to expand both domestically and internationally, we as a company must safeguard our most valuable assets, which include not only our customers and employees, but also our integrity.

Conducting business with integrity with our customers, our business partners, our stakeholders, and each other is essential to our continued success. Conducting business pursuant to high ethical standards is the right thing to do, and it is also good business.

When it comes to ethics and integrity, our goals are to conduct business with integrity, and promote ethics within our company and to external domestic and international stakeholders. If we can accomplish these goals, Syzygy Plasmonics will continue experiencing tremendous success.

Sincerely,

Amber Weaver
Vice President & General Counsel
Syzygy Plasmonics
Phone: +1-281-989-2827
Email: amber@plasmonics.tech

Syzygy Plasmonics Global Compliance Program

The Syzygy Plasmonics Global Compliance Program ensures we are conducting ourselves with integrity in accordance with our compliance policies. Syzygy Plasmonics has established a Compliance page on its publicly available website. Please visit our Compliance page for more information about compliance:

<https://plasmonics.tech/>

Syzygy Plasmonics Hot Line

If you have questions or problems concerning this Policy, you should contact:

Amber Weaver
Vice President & General Counsel
Syzygy Plasmonics
Phone: +1-281-989-2827
Email: amber@plasmonics.tech

<https://plasmonics.tech/>

Any questions or concerns directed to General Counsel may be designated “Anonymous,” in which case your identity will not be disclosed to any of Company’s personnel without your permission or by order of a court of competent jurisdiction.

You may also utilize the E-Relations platform to submit a concern anonymously by calling 1-800-813-5990 or by internet at erx.erelations.com/hotline/Syzygy.

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CODE OF CONDUCT SUMMARY

Who must adhere to the Code of Conduct?

This Code applies directly to all officers, directors, employees, and agents of Syzygy Plasmonics (referred to herein as “Plasmons”). In addition, joint venture partners, sales agents and certain third parties who represent Syzygy Plasmonics in front of others are contractually bound to follow this Code. Plasmons are responsible for conducting themselves in compliance with this Code, other Syzygy Plasmonics policies, and applicable local, state, and federal laws and regulations. When used in this Code, “Syzygy Plasmonics” or (“the company”) means Syzygy Plasmonics.

Violations of the Code of Conduct

Syzygy Plasmonics expects employees to conduct themselves in a lawful and ethical manner. Any violation of this Code will result in disciplinary action. Depending on the severity or frequency of the disciplinary problems, a verbal or written reprimand, suspension, disciplinary probation, financial penalty, and/or termination of an employee’s relationship with Syzygy Plasmonics may be necessary. In addition, an employee’s failure to adhere to this Code or other Syzygy Plasmonics policies and procedures may be taken into account in decisions regarding promotion and compensation, including incentive or performance-based compensation. It is within Syzygy Plasmonics’s sole discretion to select the appropriate disciplinary and/or remedial action to be taken.

Non-Retaliation Policy

Each Plasmon has an obligation to report possible violations of this Code so the conduct can be considered and Syzygy Plasmonics can address the situation and take appropriate action. All cases of questionable activity involving Code of Conduct violations or other potentially improper actions will be reviewed for appropriate action or corrective steps. Employees are expected to cooperate in an investigation of violations.

No one at Syzygy Plasmonics will take adverse action against anyone for providing truthful information relating to a violation of law or Syzygy Plasmonics policies. Syzygy Plasmonics will not tolerate any retaliation against persons asking questions or making good faith reports of possible violations of Company’s Code of Conduct. Anyone who retaliates or attempts to retaliate will be disciplined. Any person who believes he or she has been retaliated against should immediately follow the instructions in the “Compliance with Code of Conduct” section of this Code.

Compliance with Code of Conduct

All Plasmons must read and understand this Code and report any action or occurrence that they believe, or suspect, violates this Code. All officers, directors, employees, and agents must also recognize and comply with the policies, rules, and guidelines contained within.

If you have questions about the application of this Code, it is your responsibility to obtain answers to your questions and concerns. Syzygy Plasmonics is serious about the expectations set out in this Code of Conduct. A lack of understanding will not be an excuse for violating it.

This Code may not answer all your questions. In addition, you may encounter a situation not addressed by this Code. In those situations, we strongly urge you to ask for help by contacting your supervisor. If you do not obtain clear information from your supervisor, please contact the resources listed above, and you will have the option of remaining anonymous.

Other Important Information

Conflicts with Local Laws

If this Code of Conduct conflicts with local laws as you understand them, please immediately contact Syzygy Plasmonics General Counsel to obtain guidance.

Third Parties

As a Syzygy Plasmonics employee or stakeholder, if you retain a third party to provide services on behalf of Syzygy Plasmonics, they must follow the Syzygy Plasmonics Code of Conduct. Syzygy Plasmonics has additional policies and procedures for retaining third parties in our Global Anti-Corruption Policy which is on the Syzygy Plasmonics website at <https://plasmonics.tech/>.

Training

Training prepares us to recognize and effectively react to situations requiring ethical decision making.

Training addresses the consequences of compliance violations for both Syzygy Plasmonics and individual employees.

Training helps improve our understanding of topics in this Code and their application in practice.

We learn to live our values through discussion of real-life scenarios based on workplace violations.

We complete all required training by the due date, including compliance training and annual ethics training.

Modification of Syzygy Plasmonics Code of Conduct

The Syzygy Plasmonics Code of Conduct may be modified periodically. As a Syzygy Plasmonics stakeholder or employee you will be informed of any changes to the code.

EMPLOYMENT PRACTICES

We all deserve to work in an environment where we are treated with dignity and respect. Syzygy Plasmonics is committed to creating such an environment because it brings out the full potential in each of us. This, in turn, contributes directly to our success. We cannot afford to let anyone's talents go to waste.

Freedom from Discrimination and Harassment

Syzygy Plasmonics is an equal employment/affirmative action employer and is committed to providing a workplace free of discrimination of all types, or from abusive, offensive, or harassing behavior.

Why should we care?

Our success depends on the talent, skills and expertise of our people and our ability to function as a tightly integrated team.

Targets as well as witnesses of harassment may struggle to contribute to their full potential.

We have zero tolerance for discrimination or harassment in any form. We do not discriminate or allow discrimination based on characteristics such as race, color, gender, religion, national origin, age, disability, or veteran status. All personnel actions including hiring, benefits, transfers, compensation, and layoffs must be administered without such discrimination. Employees should expect that they will be judged based on their performance– not on the basis of personal characteristics. Any employee who feels harassed or discriminated against should immediately report the incident to his or her manager or to human resources.

Be on the lookout for:

Examples of prohibited conduct include unwelcome touching, assault, impeding or blocking movements; accessing, transmitting, or displaying offensive messages, images, or cartoons; making or using derogatory comments, epithets, slurs, jokes, or objects; and sexual harassment in any form.

Be mindful of your own behavior and how your actions, words and deeds could impact someone else.

Harassment can occur in all forms of electronic communication, in online collaboration tools, and outside the workplace.

Our policies apply to any external communication which may be connected to Syzygy Plasmonics. These policies also govern conduct in any place where we, as Syzygy Plasmonics employees, perform work, as well as off-premises situations that are connected to work.

Health, Safety, and the Environment

The personal health and safety of each member of the Syzygy Plasmonics family is of chief importance to Syzygy Plasmonics.

Why should we care?

Many of us spend more time at work than we do at home. We need to trust that our workplace is safe and that the company cares for our welfare and our environment.

The Company's policy is that every Plasmon has responsibility for creating and maintaining a safe and healthy work environment. All Syzygy Plasmonics employees and vendors must comply fully with applicable federal, state, and local health and safety laws and regulations. Each Plasmon is expected to perform his or her duties in accordance with Syzygy Plasmonics's policy by, among other things, following safety and health rules and practices and reporting accidents, injuries, and unsafe equipment, practices, or conditions. Safety standards may never be disregarded or avoided. This requires heightened awareness in our customer's facilities. In addition, a safe and healthy work environment means a workplace free from violence. Threats of violence or intimidation will not be tolerated.

Environmental compliance is a cornerstone to being and remaining a responsible corporate citizen. Numerous environmental laws and regulations have been enacted around the world regarding the protection of the environment by eliminating, reducing, or restricting the discharge or release of contaminants or pollutants into the air, water, and soil. It is Syzygy Plasmonics's policy to comply with all environmental laws. These laws and regulations are complex and involve licensing, permitting, reporting, and recordkeeping requirements, to mention just a few considerations. Environmental professionals are available and should be consulted whenever an employee has a question or concern about environmental compliance. All Plasmons must exercise sound judgment

about the environmental aspects of our use of buildings and real estate, equipment, processes, and products. Each Plasmon is charged with ensuring that his or her activities and those of their fellow workers are environmentally sound and comply with this policy.

Report immediately to the appropriate management any accident or injury sustained on the job, or any environmental, safety or health concern you may have.

BUSINESS CONDUCT

Competition Laws

The governments of most countries in which the Company conducts business have enacted antitrust or “Competition” laws. Their purpose is to ensure that markets for goods and services operate competitively and efficiently so customers enjoy the benefit of open competition among their suppliers, and sellers benefit from competition among their purchasers. Violations of the competition laws may be treated as criminal acts that can result in criminal liability for both corporations and individuals.

It is the policy of Syzygy Plasmonics to engage in fair competition in accordance with global antitrust and competition laws. Officers, directors, employees, and agents must be alert to avoid even the appearance of conduct which may be considered anti-competitive or a restraint of trade.

Fair Competition

Syzygy Plasmonics supports competition based on high quality, responsive service, and competitive price. We will conduct our affairs honestly, directly, and fairly.

Why should we care?

Maintaining the highest standards of integrity in our procurement processes, and in bidding or negotiating contracts, is essential to performing on current and future contracts, products, and services.

To comply with the antitrust laws and our policy of fair competition, employees:

- Must never discuss with competitors any matter directly involved in competition between us and a competitor (e.g., sales price, marketing strategies, market shares and sales policies).
- Must never agree with a competitor to restrict competition by fixing prices, allocating markets, or other means.
- Must not arbitrarily refuse to deal with or purchase goods and services from others simply because they are competitors in other respects.
- Must not require others to buy from us before the Company will buy from them.
- Must not require customers to take from us a service they don’t want as a condition to acquire the service they do want.
- Must never engage in industrial espionage or commercial bribery.
- Must be accurate and truthful in all dealings with customers and be careful to accurately represent the quality, features, and availability of company products and services.

It is important that Plasmons consult with Syzygy Plasmonics General Counsel whenever there is a question related to their business activities regulated by these laws.

These activities not only violate policy, but also may be illegal:

- Discussing, using, copying, or distributing any unauthorized information (especially pricing, bid strategy or customer information obtained during bids or negotiations or in connection with attendance at trade shows, industry groups or training) without seeking guidance from the legal department
- Discussion or agreement with competitors or partners to allocate bids, contracts, customers, markets or territories, or coordinate pricing or limit supply of products or services

Report any inquiries made to us in connection with our bid or negotiation activities to the Legal Department.

Bribery/Corruption

Stated simply, Syzygy Plasmonics does not pay bribes.

It is the policy of Syzygy Plasmonics and its Plasmons to comply fully with applicable U.S. and international laws prohibiting corruption, including the FCPA and similar anti-bribery laws of other countries. Where other anti-corruption laws apply and are more restrictive than the FCPA, those laws must be followed.

Why should we care?

Corruption creates unfair competition, increases cost, and jeopardizes the quality and capability of our products and services.

Bribery, including even the attempt to corrupt, is illegal and may be enough to be prosecuted under U.S. and other countries' laws.

Conducting business where there is even a hint of impropriety could cause irreparable reputational and legal harm to our business, in addition to significant financial penalties and debarment.

The use of Company funds or assets for any unlawful, improper, or unethical purpose is prohibited. Failure to comply with this Policy may result in significant civil and criminal penalties for Syzygy Plasmonics and the individual(s) involved, which is cause for disciplinary action against such individual(s), up to and including termination.

The FCPA also requires accurate and complete books and records and the maintenance of proper internal accounting controls. To comply with these requirements, all Company personnel must follow Syzygy Plasmonics's accounting requirements. Company personnel should never consent to requests for false invoices or for payment of expenses that are unusual, excessive, inadequately described, insufficiently documented, or should otherwise raise questions.

A party's poor reputation, ties to government and public officials, questionable or unusual circumstances, unusual compensation and questionable accounting or invoicing, or insufficient capabilities are red flags.

Expressions such as 'that's the way business is done here', 'everyone does it', 'that is what is expected to win the contract', or 'this is normal in this country' are also red flags.

Report any suspicious activity to the General Counsel.

Syzygy Plasmonics Global Anti-Corruption Policy can be found on the Syzygy Plasmonics public domain website at:

<https://plasmonics.tech/>

Gifts and Entertainment

At Syzygy Plasmonics, we sometimes exchange business courtesies such as meals, entertainment, gifts, and other items with our customers, suppliers, and others with whom we do business in order to build a stronger business relationship through fostering goodwill. There are times, however, when such business courtesies are not appropriate. This Code of Conduct and the “Gifts to and Entertainment of Foreign Officials” policy contained in the Global Anti-Corruption Policy provide guidelines and procedures to ensure our business courtesies are always appropriate. In most cases our clients have strict guidelines with respect to gifts and entertainment and we are contractually obligated to adhere to their policy.

Why should we care?

When people exchange gifts or business courtesies, it can create the perception that favors were granted in order to improperly influence business judgment.

We compete on the merits of our products and services and do not give business courtesies to gain an unfair competitive advantage.

We source products and services fairly and avoid accepting business courtesies that may cause even the perception of an inappropriate business relationship.

It is never appropriate to give or accept a business courtesy unless:

- It would be consistent with good business practices.
- It is for the purpose of promoting goodwill, rather than to create or respond to a specific business decision.
- It is not a bribe, and it does not create the appearance of being improper.
- It is of reasonable and appropriate value and is customary as determined by applicable local laws and reasonable local practice.
- It is not intended to create an obligation for the recipient to take any action he or she would not normally take.
- Public disclosure of the courtesy would not be an embarrassment to Syzygy Plasmonics.
- The courtesy would not create a conflict between a Syzygy Plasmonics employee’s personal interests and the best interests of Syzygy Plasmonics.

In addition, there are certain principles that apply without exception. You must consider these principles when considering giving or receiving a business courtesy. It is never permissible to:

- Offer or accept a bribe;
- Offer or accept cash or cash equivalents;
- Participate in any business activity that would violate the law; or
- Ask for anything directly or indirectly from organizations doing business or seeking to do business with Syzygy Plasmonics

It is also important to recognize that dealing with government officials or government-controlled entities raises additional conditions and restrictions concerning the giving or receiving of business courtesies. When you are dealing with people associated with the government, what might be acceptable in a purely commercial setting may be unacceptable or even against the law. No business courtesies may be offered or given to any government official or government-controlled entities or

their employees unless they are first approved in accordance with the applicable policies and procedures set out in the Global Anti-Corruption Policy.

Complex rules and monetary limits apply when dealing with foreign government officials. Consult policy and obtain guidance from our General Counsel if you are uncertain if an action is inappropriate or within the allowable limits.

It is not only the value of the business courtesy that matters. The simple act of offering, giving or receiving any business courtesy, or the perception of an intent to gain an improper business advantage, may be illegal or unethical.

Syzygy Plasmonics Global Anti-Corruption Policy can be found on the Syzygy Plasmonics public domain website at:

<https://plasmonics.tech/>

Political Contributions

The Company shall not make contributions to political parties or committees or to individual politicians without the prior written consent of the General Counsel or Director of Government Relations in line with Government Relations Policies. Approved contributions may only be made in accordance with the applicable law, and all requirements for public disclosure of such contributions shall be complied with fully.

International Trade

Syzygy Plasmonics must honor the laws and regulations that restrict or prohibit business with certain countries, entities, or individuals. These laws and regulations include U.S. trade restrictions, export controls, and anti-boycott laws, as well as trade restrictions and export controls enforced by other countries where Syzygy Plasmonics conducts business or by the United Nations.

Why should we care?

Export and import violations, and illegal boycotts, damage the trust and transparency needed to transact legitimate and long-term business.

Our customers expect fair and open competition in how we do business worldwide with our competitors, suppliers and customers.

Many members of the Syzygy Plasmonics family are subject to these restrictions due to their involvement in transactions connected with the U.S. or their affiliation with Syzygy Plasmonics. For example, using U.S. banks, routing paperwork through the U.S. for processing, or receiving help from a U.S. citizen located anywhere in the world may be sufficient involvement for these restrictions to apply.

U.S. laws prohibit or restrict certain dealings with designated parties and entities controlled by or otherwise associated with sanctioned countries or parties engaged in sanctioned activities, including terrorism, narcotics trafficking, and the manufacture and distribution of weapons.

Any written or oral request in bids and proposals to comply with boycotts not sanctioned by the U.S. Government is a boycott red flag and must be immediately reported to our General Counsel, even if Syzygy Plasmonics decides not to proceed with the bid / proposal.

These restrictions can include sanctions or embargoes that prohibit Syzygy Plasmonics from engaging in certain business activities in specified countries, as well as with specified individuals and entities. For example, U.S. law prohibits interaction with identified terrorist states and organizations.

Conduct of International Operations

All Plasmons must uphold the integrity of Syzygy Plasmonics in all nations in which we do business. Laws and customs vary throughout the world, so it is imperative that officers, directors, employees, and agents be sensitive to local customs and legal requirements that apply and support them further with the Code's principles when conducting business.

Protecting Syzygy Plasmonics Assets

Safeguarding Proprietary Assets

We very often know information about our business that others outside the Syzygy Plasmonics family do not. We are entrusted with that business information and we may not take advantage of our special knowledge for our, or others', personal gain. This policy also extends to information about our customers or suppliers. It is inappropriate to purchase or sell a third party's securities if you are aware of material information about that third party that is not available to the public. At Syzygy Plasmonics, we treat sensitive information we receive from customers, suppliers, and other business associates as carefully as we treat our own information.

Data Security and Privacy

We are committed to maintaining the security and privacy of personal data provided to Syzygy Plasmonics by team members, customers, third parties, and others.

Why should we care?

We generate, acquire, and access large amounts of valuable information every day. This information provides us and our customers with business, technological, and economic advantages.

Even a single incident of mishandling information can damage our reputation, and that of our customers, partners and the countries we call home.

Personal data is any information that can be used directly or indirectly to identify an individual person. This includes a person's name, phone number, address and email address: both business and personal. We will collect, record, and use personal data in a proper and professional manner and are accountable to demonstrate compliance with the principles of data protection, including fair and lawful use, purpose specification, collection limitation, deletion, data quality, security safeguards and transparency. All personal data provided to Syzygy Plasmonics by team members, customers, third parties and others must be treated as confidential. Syzygy Plasmonics has implemented technical, administrative, and physical procedures to protect personal data from unauthorized access, loss, misuse, alteration, and disclosure. Any unauthorized access or processing of personal data by team members or third parties is prohibited.

Make sure you obtain proper approval before publishing or making external presentations about Syzygy Plasmonics or its customers or partners.

Wherever we do business there are country-specific laws and regulations governing import/export issues and unique information handling and safeguarding requirements.

When using social media, take extra care to protect information about the Company, your colleagues, customers and yourself.

Information protection requirements stay in effect even after your employment or engagement with the Company ends.

If you discover or suspect a data security incident, a cyberattack, or a possible breach of personal data, immediately notify your IT or Legal department.

Conflict of Interest

At Syzygy Plasmonics, we must protect the integrity of our business decisions by basing them solely on the best interests of Syzygy Plasmonics and not personal interests. A “conflict of interest” occurs when an individual’s personal interests interfere, or appear to interfere, with the interests of Syzygy Plasmonics.

Why should we care?

It’s human nature to think we can balance multiple interests at the same time. We may not realize when our loyalties may be divided. That’s why we focus on disclosing even potential conflicts of interest - so we can get an independent, objective assessment and take appropriate mitigating action.

A conflict can arise when an individual takes actions or has interests that may make it difficult to perform his or her work objectively and efficiently. For example, the “Gifts and Entertainment” section of this Code outlines potential conflicts with respect to giving and receiving business courtesies. Conflicts of interest also arise when an individual, or a member of his or her family, receives improper personal benefits as a result of his or her, or his or her family member’s position in Syzygy Plasmonics, or when he or she makes use of company, or business opportunities obtained through the use of Syzygy Plasmonics property, information, or positions without obtaining appropriate approval. Conflicts may also arise when an individual is involved in personal business interests that detract from or conflict with his or her job or other interests at Syzygy Plasmonics. It is important to avoid conflicts or the appearance of a conflict of interest.

Syzygy Plasmonics expects loyalty from its officers, directors, employees, and agents, and that such loyalty is free of any conflicts of interest. Each Plasmon, or member of their immediate family, is expected to avoid any investment or involvement that might in any way affect the Plasmon’s actions on behalf of Syzygy Plasmonics’s best interests.

Protecting Syzygy Plasmonics Assets

All Plasmons must protect Syzygy Plasmonics’s assets and ensure their efficient use.

Why should we care?

Theft, carelessness, and waste directly impact our profitability and violate the trust others have put in us. Syzygy Plasmonics’s assets must be always used only for legitimate business purposes.

In addition, we often work with information that is confidential or proprietary to Syzygy Plasmonics. Some of this information comes from Syzygy Plasmonics’s own activities, including

research projects, operational improvements, and general business processes and communications. Other types of information may come from our customers, suppliers, or other third parties with whom we conduct business. Some customers provide us information subject to confidentiality and/or non-disclosure agreements. It is Syzygy Plasmonics's policy that all such confidential information shall be distributed within Syzygy Plasmonics on a strict "need-to-know" basis. No Plasmon shall be permitted to disclose such information, including disclosure to coworkers, friends, relatives, or acquaintances, or to use such information to his or her advantage or for the benefit of others. Under no circumstances should Plasmons improperly obtain or disclose trade secrets and other confidential or proprietary information whether it is provided by Syzygy Plasmonics or any of our third-party associates. All confidential information should be physically secured and protected from disclosure. This policy applies to paper documents as well as electronically stored or transmitted information.

Syzygy Plasmonics's business involves the furnishing of products and services that are of prime importance to our customers. The information provided by customers is essential for Syzygy Plasmonics to provide the right product or service to them. Under no circumstances should Plasmons improperly obtain, use, or disclose trade secrets or confidential information of others. Our business associates provide Syzygy Plasmonics confidential information because they trust us, and we must constantly protect the trust we have earned.

Syzygy Plasmonics's policies with respect to confidential information also apply to former Plasmons. While it is important that those people working for Syzygy Plasmonics follow these policies, when people leave the Syzygy Plasmonics family they are expected to honor their commitments to the Company and avoid disclosing or misusing the confidential information they obtained while employed at Syzygy Plasmonics. As with our physical assets, the confidential information obtained at Syzygy Plasmonics is valuable to Syzygy Plasmonics and must be treated as such.

Finally, all Plasmons must obey all applicable laws and Syzygy Plasmonics policies with respect to retaining and disposing of records and other information. Syzygy Plasmonics policies and some laws require that companies keep records for a certain period. It is important that you keep records and other information for the period required, and when you consider disposing of such information, you confirm that disposal would not violate Company policy or applicable laws. If you have any questions about the laws and policies that apply to records and other information, contact the Syzygy Plasmonics Legal Department.

Be on the lookout for:

- Using customer assets for anything other than as specifically contractually allowed/authorized.
- Sending/storing/handling sensitive information on a personal computing device.
- Sending company information to personal email addresses.
- Using unapproved electronic items such as memory sticks to store data in company / customer assets.
- Personal use of company assets.

Artificial Intelligence

We understand that Artificial Intelligence (“AI”) can have tremendous benefits in many different areas of our business. We also believe that it is our responsibility to use AI that is in line with our values.

Why should we care?

We recognize that AI holds tremendous potential benefits for our customers and our operations, and we intend to be an industry leader in this revolutionary technology. Access to tremendously valuable data and high-performance computing has unleashed unprecedented opportunities in AI that are changing the way companies operate in all industry sectors. We understand that, as a rapidly evolving discipline, there may be risks that must be considered and addressed in the design and implementation of AI systems.

Be on the lookout for:

If you are involved in the development, procurement, deployment, or internal use of AI systems, ensure you are familiar with the principles and concepts outlined in our AI policy.

Financial Reporting and Accounting Controls

Syzygy Plasmonics requires information in order to prepare financial statements.

Why should we care?

Our customers and investors expect us to maintain the integrity of our records.

Our complex business processes demand that each of us be able to rely on the accuracy of the data we provide each other to serve our customers.

Keeping accurate records is critical to accurately recording and reporting financial transactions and meeting our legal and regulatory obligations.

Investor trust and confidence are important, and our investors rely on accurate disclosures.

In certain circumstances Syzygy Plasmonics’ financial statements or a summary of Syzygy Plasmonics’ financial position may be required or necessary to disclose to a third party, regulator, or possibly for public information. Syzygy Plasmonics requires that full, fair, accurate, timely, and understandable information be made with respect to reports and documents that are used to prepare our financial statements. Syzygy Plasmonics is also required to make and keep books, records, and accounts that reflect accurately, fairly, and in reasonable detail, the transactions and dispositions concerning Syzygy Plasmonics’s assets. In addition, Syzygy Plasmonics requires the creation and maintenance of a system of internal accounting controls for the Syzygy Plasmonics family sufficient to provide reasonable assurance that:

- Transactions are executed in accordance with management’s general or specific authorization;
- Transactions are recorded as necessary to permit preparation of financial statements in conformity with generally accepted accounting principles or any other criteria applicable to such statements and to maintain accountability for assets;
- Access to assets is permitted only in accordance with management’s general or specific authorization;
- Recorded accountability for assets is compared with the existing assets at reasonable intervals and appropriate action is taken with respect to any differences.

Syzygy Plasmonics also strongly maintains the following prohibitions:

- No false, artificial, or fictitious entries shall be made on the books or records for any reason.
- No payment on behalf of Syzygy Plasmonics shall be made or approved with the understanding that it will or might be used for something other than the stated purpose.
- No undisclosed or unrecorded fund, account, or asset may be maintained or established for any purpose.
- No action may be taken, either directly or indirectly, to fraudulently influence, force, manipulate, or mislead our independent registered accounting firm for the purpose of making our financial statements misleading.

Be on the lookout for:

Be mindful of any proprietary or confidential information included in any type of public disclosure, including external communications.

You must properly account for all costs, including labor, travel, material, and any other expenses.

If you prepare business or financial records or public communications on behalf of the Syzygy Plasmonics, you must ensure that all information they contain

is comprehensive, fair, timely, accurate and understandable.

These activities not only violate policy, but may also be illegal:

Inaccurate pricing information submitted in proposals.

Inaccurate reporting of business travel expenses.

Inaccurate labor charging.