

Grigale Code of Conduct

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Antitrust and Competition Laws

Grigale is committed to observing the applicable antitrust or competition laws of all countries. Although these laws may vary from country to country, they generally prohibit agreements or actions that reduce competition without benefiting consumers. They seek to protect the competitive process so that consumers receive the benefits of competition. Violations of antitrust or competition laws may result in severe penalties, including large fines and jail terms.

Compliance with antitrust or competition laws is required at all times.

Therefore, you must not agree with any competitors to **(i)** fix or control prices, either by agreeing directly with a competitor or any other method, such as through third parties; **(ii)** structure or orchestrate bids to direct a contract to a certain competitor or reseller (bid rigging), including abstaining from bids or submitting noncompetitive or “courtesy” bids; **(iii)** boycott suppliers or customers; **(iv)** divide or allocate markets or customers; or **(v)** limit the production or sale of products or product lines. These prohibited agreements are against both public policy and Grigale policy and should be equally avoided in your discussions with Grigale and other Grigale employees, as well

as representatives of other companies. In addition, you must refrain from prohibited discussions with competitors (whether GrigaleDirect, other Grigale employees, or other companies) about prices, costs, profits or profit margins, production volumes or bids, or quotes for a specific customer’s business.

It is important to note that competitors are Grigale direct sales, other Grigale employees, or any other entity that may compete with you for a business opportunity. If you are ever solicited by an Grigale employee to engage in any of this prohibited conduct, you are to report this behavior to the Grigale Legal Department.

Certain sales tactics or other arrangements with customers or suppliers may also raise antitrust and competition law risks, if they unfairly restrain or prevent competition by your competitors or among your customers.

Examples of sales arrangements that have been found to violate the antitrust laws include predatory pricing below cost, exclusive dealing contracts, bundled or tie-in sales, agreements with customers or suppliers about minimum resale prices, and discriminating between competing customers. Regardless of your location, the antitrust laws of the United States are likely applicable as they apply to business operations and transactions related both to imports to or exports from the United States.

Improper Payments, Money Laundering, and Economic Boycotts

Grigale Employees cannot offer or pay bribes. You are prohibited from offering, promising, authorizing, directing, paying, making, or receiving any bribes, kickbacks, or payments of money or anything of value (directly or indirectly) to improperly obtain business or any other advantage for Grigale or yourself.

The Foreign Corrupt Practices Act (FCPA) and other similar international anticorruption laws outlaw bribery. Penalties for violating these laws are severe and can include prison time and large fines for individuals. Grigale also prohibits all forms of money laundering, which involves disguising, channeling unlawfully obtained money, or transforming such money into legitimate funds.

The above prohibition applies to

Government and public sector, which includes public utilities, higher education, public healthcare entities, and public international organizations and their employees or officials

Political parties or candidates for political office

Business entities partially or wholly owned or controlled by government interests (often referred to as state-owned enterprises) and their employees or officials

Privately held commercial companies and their employees

Grigale employees

Any other third party

Grigale prohibits giving money or anything of value directly or indirectly to a government official or employee of a state-owned enterprise, or to the spouse,

significant other, child, or other relative of any such person, for the purpose

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Lev Ha'aretz industrial zone, Rosh Ha'ayin Israel

of influencing or rewarding an action or decision of the government or public sector employee or official or to gain any improper advantage for Grigale.

“Anything of value” is intended to be broad and covers not only money, but also gifts, lavish or excessive entertainment, funding of personal travel such as sightseeing, contributions to charity, and employment opportunities.

Grigale also prohibits facilitation or facilitating payments, which are payments to an official to speed up or expedite routine government actions, including processing and approving applications and permits.

You must not participate in any economic boycott not sanctioned by the United States Government. You must not provide information that could be construed to support any such unsanctioned boycotts.

Dealing with Government

Grigale's standards and the applicable laws for dealing with government and public sector employees or officials are more stringent than standards for commercial company employees.

You must strictly observe the laws, rules, and regulations that govern the acquisition of goods and services by any governmental entity of any country and the performance of government contracts. Activities that may be appropriate when dealing with nongovernment customers may be improper and even illegal when dealing with government. If you deal with any governmental entity, including public international organizations, you are responsible for knowing and complying with all rules that apply to government contracting and interactions with government or public sector employees and officials, including but not limited to the following:

You must not attempt to obtain, directly or indirectly, from any source, procurement-sensitive information that is not publicly available or otherwise authorized for disclosure by the government; confidential internal government information, such as pre-award, source selection information; or any proprietary information of a competitor, including, for example, bid or proposal information, during the course of a procurement or in any other circumstances where there is reason to believe that the release of such information is unauthorized.

You must ensure the submission of accurate invoices to the government and comply with all laws regarding invoicing and payments.

You must not give or offer, either directly or indirectly, any gratuity, gift, favor, entertainment, loan, or anything of monetary value to any government or public sector employee or official except as may be permitted by applicable law. You are required to establish and maintain appropriate internal controls to ensure compliance with all applicable local country and US laws concerning prohibitions on offering anything of value to government and public sector employees or officials.

You must not provide, attempt to provide, offer, or solicit a kickback, directly or indirectly, to obtain or reward favorable treatment in connection with any transaction.

Lobbying of Government Officials

You must not pay or enter any agreement to pay, directly or indirectly, a contingent fee to any party for the purposes of obtaining a government contract or influencing government action. You may not receive any contingent fees or participate in any influence/referral fee program on any transaction involving a government or public sector end user (this includes, but is not limited to, public higher education, public healthcare, and utility entities). There are additional policies that govern the methods in which Grigale is allowed to compensate its Partners, particularly for those transactions that involve government or public sector employees and officials.

If you are selling or offering to sell commercial products to the United States Government, you should be familiar with and must ensure compliance with the laws and regulations concerning the sale of commercial products and sales to government and, if applicable to you, the Multiple Award Schedule (MAS) contracting regulations of the General Services Administration (GSA).

Lobbying is generally any activity that attempts to influence laws, regulations, policies, and rules. In certain jurisdictions, however, the legal definition of “lobbying” can also cover procurement and business development activity. You are responsible for understanding when your activities may legally be considered lobbying in a particular jurisdiction and for complying with all applicable laws.

You may not lobby government on behalf of Grigale. Government relations consultants/lobbyists retained by you may not be used by Grigale, and you may not use Grigale’s consultants/lobbyists for any such purpose.

Trade Compliance Laws and Regulations

United States global trade laws and regulations govern all imports, exports, re-exports, and use of US origin commodities and technical data, wherever located. Grigale requires that you comply fully with all applicable US and global trade laws and regulations. Failure to comply could result in the loss or restriction of your or Oracle's trade privileges. Violation of these laws and regulations may also result in fines and imprisonment. You are responsible for understanding how the global trade laws and regulations apply and for conforming to these laws to ensure no technology, data, information, program, and/or materials resulting from services (or direct product thereof) will be imported or exported, directly or indirectly, in violation of these laws, or will be used for any purpose prohibited by these laws and regulations.

Conflicts of Interest

Contracting

The term “conflict of interest” describes any circumstance that could cast doubt on your ability to act with total objectivity with regard to the distribution of Oracle products and services. Grigale wants its employees’ loyalty to be free from any conflicts of interests. Conflict of interest situations may arise in many ways. If you feel that you have an actual or potential conflict with Grigale or any of its employees, you must report all pertinent details to Grigale.

Grigale expects its employees to compete fairly and ethically for all business opportunities. Employees who are involved in the sale or licensing of products/services, the negotiation of agreements, or the delivery of services to Grigale and/or Grigale’s customers are expected to understand and honor the terms of contractual agreements. You must ensure that all statements, communications, and representations to customers are accurate and truthful as they relate to Grigale.