

## **RealWear Third Party Code of Conduct**

RealWear takes pride in our values and we hold ourselves accountable to the highest standards of honesty, ethics, and integrity. Our reputation remains strong because everyone acting on the company's behalf – employees, directors, partners, and third-party representatives – is expected to comply with laws, regulations and company policies and to uphold the company's values.

No value is more important to RealWear than “Be Ethical”. We believe that to stay competitive in the market, a reputation for integrity is an asset that not only enhances our combined value but also contributes to our individual success and growth in the long run. Business is all about trust and trust is built on integrity.

### **Applicability of this Code**

This Third-Party Code of Conduct sets forth RealWear's expectations of its third parties and is based on the values and principles set forth in RealWear's Third Party Code of Conduct, available on our website. If you have concerns or see something that does not align with this code, you can contact our compliance hotline at [realwear.ethicspoint.com](http://realwear.ethicspoint.com).

We require that all RealWear third parties\* understand and live our values and embrace the same high ethical standards of business conduct that has been our hallmark. Among other things, this means that all RealWear third parties are required to comply with all applicable laws and regulations, wherever they do business. We expect RealWear third parties to ensure that the principles set out in this Code are implemented and communicated throughout their organization, making it available to its employees and to those sub-third parties that work on behalf of RealWear.

\*For the purposes of this document, the term third parties includes, but is not limited to: distributors, direct or indirect resellers, contract logistics, suppliers, consultants and contractors and others as may be prescribed from time to time (hereafter referred to collectively as “third parties”).

**Andrew Chrostowski**  
CEO and Chairman  
RealWear, Inc.



## **Introduction**

Third parties include any person, organization, or company with which RealWear contracts, including suppliers and commercial third parties. RealWear seeks productive, ethical, and transparent relationships with its third parties. Third parties will avoid conflicts of interest and operate honestly and ethically throughout the supply chain and in accordance with applicable law, including those laws pertaining to: anti-competitive business practices, respect for and protection of intellectual property, company and personal data, export controls and economic sanctions.

## **Legal & Regulatory Compliance**

### **Fair Competition / Anti-Trust**

Abide by all applicable competition and antitrust laws and regulations and ensure that bids for tenders are independent and fair. Do not discuss price-sensitive or otherwise competitively sensitive information with any competitors. Refrain from entering into any agreements that could restrict competition. Obtain information concerning competitors using only ethical means and lawful public sources.

### **Anti-corruption**

Behave ethically in all business dealings and act in a transparent manner. Third parties will not tolerate corruption, bribery, embezzlement or fraud in any form. This includes giving or receiving anything of value, including money, gifts or unlawful incentives to improperly influence negotiations or any other dealings with governments and government officials, customers, or any other third parties.

### **Trade Compliance**

Comply with all applicable trade compliance laws and regulations, including export controls and international sanctions. Work only with and through reputable customs agents. Ensure that all valuations, declarations, and documents pertaining to trade and customs matters are accurate and complete.

### **Insider Trading**

Ensure that all confidential or non-public information obtained in relation to RealWear is used only for lawful purposes and solely for the purpose(s) for which it was obtained. Such information

should not be used for the personal benefit of any employee or individual. Never trade shares based on insider information or encourage anybody to trade shares based on insider information.

### **Money Laundering / Tax Evasion**

Follow international and local anti-money laundering laws, as well as laws concerning the facilitation of terrorism and tax evasion. Implement robust internal processes to ensure adherence to applicable laws and best practices. Take all the necessary steps to work only with reputable customers and to engage in business transactions only where the source of funds is known to be legitimate.

### **Intellectual Property and Confidential Information**

Respect and protect RealWear's intellectual property and confidential information and do not publish, use or disclose such information to any unauthorized third party. Use confidential information only for RealWear's legitimate business purposes and in line with RealWear's information security requirements. Use the RealWear brand and trademark only after RealWear's express written consent. Protect and responsibly use RealWear assets and comply with our requirements for maintaining confidentiality and security of these assets. Respect and protect any intellectual property and confidential information of others received for use by RealWear in accordance with the terms of any applicable agreement.

### **Ethical Business Practices**

#### **Business Integrity**

Third parties will avoid even the appearance of conflicts of interest in their work with us, and will immediately disclose any known family or other close personal relationships with RealWear employees who have an influence over their engagements with us. If third parties extend any business courtesies to our employees, they will do so infrequently and the courtesies must be of no more than moderate value. Third parties will implement monitoring and enforcement procedures to ensure compliance with anti-corruption laws.

#### **Record Keeping**

Maintain accurate, complete and reliable records of all transactions and expenses incurred for or on behalf of RealWear. All records should be maintained in a timely manner and in reasonable detail in accordance with applicable accounting principles, laws, and regulations. On request, provide RealWear with all relevant documentation, including transaction details, invoices and/or receipts regarding sales of any RealWear products or services.

#### **Reporting Integrity Concerns**



600 Hathaway Road  
Suite 105  
Vancouver WA 98661  
USA

If any situation develops that causes the third party to operate in violation with this Code of Conduct.

Third parties must promptly inform RealWear via their contact or a member of the RealWear management directly, or contact our compliance hotline at [realwear.ethicspoint.com](https://realwear.ethicspoint.com).