

PTL Code of Conduct and Partner Code

Introduction

PTL is committed to conducting business ethically, responsibly, and in compliance with applicable laws and regulations in the jurisdictions where it operates. This Code of Conduct and Partner Code sets out the standards of behavior expected of PTL personnel and PTL's business partners.

This Code is intended to support sound judgment, responsible business conduct, and a respectful, secure, and professional working environment. It is not intended to address every situation that may arise. Where questions or concerns exist, individuals are expected to seek guidance and raise issues through appropriate channels.

Scope

This Code applies to:

- PTL employees, officers, directors, temporary workers, contractors, consultants, interns, and other internal stakeholders; and
- PTL suppliers, vendors, agents, intermediaries, representatives, consultants, affiliates, and other business partners who provide goods or services to PTL or act on PTL's behalf.

All persons covered by this Code are expected to comply with:

- this Code;
- applicable laws and regulations;
- applicable contractual obligations; and
- relevant PTL policies and procedures.

Questions about how this Code applies should be raised with management or Legal at legal@paytestlab.com.

Reporting Concerns and Cooperation

PTL encourages prompt reporting of suspected misconduct, policy violations, unlawful activity, security concerns, or other behavior inconsistent with this Code. Reports made in good faith will be treated seriously and reviewed appropriately.

Reports under this Code may be made to management or Legal at legal@paytestlab.com.

PTL prohibits retaliation against any person who, in good faith, raises a concern, seeks guidance, or participates in a review or investigation.

Persons covered by this Code are expected to cooperate honestly and reasonably with internal reviews, investigations, and compliance inquiries.

Consequences of Violations

Failure to comply with this Code may result in appropriate action, which may include corrective measures, disciplinary action, termination of employment or engagement, suspension of access to PTL systems or facilities, or other measures considered appropriate under the circumstances.

Administration

PTL may update this Code from time to time. This Code operates alongside applicable laws, contractual obligations, and PTL policies and procedures.

Part I: PTL Code of Conduct for Employees and Internal Stakeholders

1. Integrity, Honesty, and Ethical Conduct

PTL expects all personnel to act with honesty, fairness, accountability, professionalism, and ethical judgment in all business activities. This includes telling the truth, honoring commitments, using sound judgment, acting responsibly, and conducting business in a manner that protects PTL's reputation and the trust placed in it by colleagues, customers, partners, and other stakeholders.

Personnel are expected to make ethical decisions, avoid improper conduct, and raise concerns where something appears inconsistent with this Code, PTL policies, or applicable law. Personnel should avoid conduct that is misleading, deceptive, improper, or inconsistent with PTL's values and responsibilities.

2. Respectful Workplace

PTL is committed to a workplace in which all individuals are treated with dignity, respect, and fairness. PTL values diverse backgrounds, perspectives, and experiences and seeks to foster an inclusive, professional, and collaborative environment.

Discrimination, harassment, bullying, intimidation, and retaliation are not permitted. Personnel are expected to conduct themselves professionally in person, online, and in all work-related interactions.

3. Health and Safety

PTL is committed to providing a safe and healthy work environment. Personnel are expected to follow applicable health, safety, and security requirements, use

good judgment, and report hazards, unsafe conditions, accidents, or incidents promptly.

Everyone shares responsibility for helping maintain a safe, secure, and respectful workplace.

4. Confidentiality, Privacy, and Sensitive Information

Protecting confidential information, personal data, and other sensitive information is an important responsibility at PTL. Personnel may have access to nonpublic information relating to PTL, its customers, employees, partners, systems, technologies, or business operations. Such information must be protected and handled responsibly.

Personnel must:

- use confidential or sensitive information only for legitimate business purposes;
- limit access to those who are authorized and have a legitimate need to know;
- follow PTL policies and procedures for handling, storing, sharing, and protecting information;
- help prevent unauthorized access, disclosure, misuse, loss, or destruction of information; and
- promptly report suspected privacy, confidentiality, or security incidents through appropriate channels.

Personnel should not disclose PTL or third-party confidential information without proper authorization, whether during or after their employment or engagement, except as permitted by law or PTL policy.

5. Responsible Use of Systems and Company Resources

PTL resources, including equipment, technology, systems, funds, facilities, and information assets, must be used responsibly and for legitimate business purposes. Personnel are expected to protect PTL resources from loss, theft, misuse, damage, or unauthorized access.

When using PTL systems and technology, personnel must follow applicable PTL policies, including those relating to acceptable use, information security, and communications.

6. Conflicts of Interest

Personnel must avoid situations in which personal interests conflict, or appear to conflict, with the interests of PTL. Conflicts of interest can interfere with objective decision-making and undermine trust.

Examples may include:

- personal financial interests in a competitor, customer, supplier, or partner;
- outside work or business activities that interfere with PTL responsibilities;
- involvement in decisions affecting friends or family members; or
- accepting personal benefits that could influence business judgment.

Any actual, potential, or perceived conflict of interest should be disclosed promptly so that it can be reviewed and managed appropriately.

7. Compliance with Laws, Regulations, and PTL Policies

PTL expects personnel to comply with applicable laws, regulations, and PTL policies relevant to their work. This includes acting lawfully, responsibly, and in good faith, and seeking guidance where requirements are unclear.

No one should assume that business goals justify conduct that is unlawful, improper, or inconsistent with this Code.

8. Anti-Bribery and Improper Payments

PTL does not permit bribery, kickbacks, facilitation payments, or other improper payments or benefits in any form. Personnel must not offer, promise, give, request, or accept anything of value in order to improperly influence a business decision, obtain an unfair advantage, or secure improper treatment.

Reasonable and lawful business courtesies may be acceptable in some circumstances, but they must never be used to create an improper obligation or influence judgment.

Personnel are expected to comply with PTL's Anti-Bribery Policy and any related procedures or guidance. If there is uncertainty, the matter should be raised through appropriate PTL channels before action is taken.

Reasonable and lawful business courtesies may be acceptable in some circumstances, but they must never be used to create an improper obligation or influence judgment.

If there is uncertainty, the matter should be raised through appropriate PTL channels before action is taken.

9. Fair Dealing and Business Conduct

PTL is committed to fair and honest business practices. Personnel should deal truthfully and professionally with customers, partners, competitors, regulators, and colleagues.

Misrepresentation, fraud, deceptive conduct, and other unfair business practices are not permitted.

10. Information Security and Cross-Border Business Practices

Because PTL operates across multiple jurisdictions and works with technology, systems, and sensitive information, personnel are expected to act carefully and follow PTL requirements relating to information security, access controls, cross-border activities, and other compliance matters relevant to their roles.

Personnel should seek guidance before engaging in activities that may raise legal, regulatory, security, or cross-border concerns, including unusual requests, restricted transactions, or nonstandard information-sharing arrangements.

11. Accurate Records and Responsible Business Documentation

PTL expects business records, reports, submissions, and supporting documentation to be complete, accurate, and honest. Personnel must not create false, misleading, or incomplete records, and must follow applicable approval, reporting, and recordkeeping requirements.

This applies to financial records, expense submissions, time records, invoices, certifications, and other business documentation.

12. Community and Environmental Responsibility

PTL recognizes its responsibilities to the communities in which it operates and encourages responsible business practices. PTL seeks to act in a manner that is mindful of environmental impact, efficient use of resources, and fair treatment of others.

Personnel are encouraged to support these objectives in a practical and responsible way.

13. Speaking Up

Personnel should feel comfortable raising questions or concerns relating to misconduct, unethical behavior, policy violations, security concerns, workplace issues, or other matters covered by this Code.

Concerns may be raised to management or Legal at legal@paytestlab.com.

Reports made in good faith are valued and help PTL address issues early and appropriately.

Part II: PTL Partner Code of Conduct for Suppliers, Vendors, Agents, and Other Business Partners

1. Ethical Business Practices

PTL expects its business partners to conduct themselves honestly, fairly, professionally, and ethically. Partners should act with integrity in all dealings involving PTL and should avoid fraud, deception, corruption, bribery, and other improper practices.

Partners are expected to provide accurate information about their services, qualifications, and business practices, to communicate truthfully with PTL, and to conduct PTL-related work in a manner consistent with responsible and ethical business conduct.

2. Compliance with Laws and Contractual Obligations

Partners must comply with applicable laws, regulations, and contractual obligations relevant to the goods or services they provide to PTL. Partners are also expected to maintain any licenses, permits, authorizations, or registrations required for their operations.

Where legal or compliance concerns arise in connection with PTL-related work, partners are expected to address them responsibly and raise them with PTL where appropriate.

3. Labor, Human Rights, and Respectful Treatment

PTL expects partners to treat workers fairly and with respect and to comply with applicable labor, employment, human rights, anti-trafficking, and workplace laws.

Partners must not use forced labor, child labor, or other exploitative practices. Partners should maintain workplaces free from unlawful discrimination, harassment, and abusive treatment and should support lawful and fair working conditions.

4. Health, Safety, and Environmental Responsibility

Partners are expected to provide safe and healthy working conditions and to comply with applicable health, safety, and environmental requirements relevant to their operations.

PTL encourages partners to act responsibly with respect to workplace safety, environmental impact, and resource use.

5. Confidentiality, Privacy, and Data Security

Partners who have access to PTL confidential information, customer information, personal data, systems, intellectual property, or other sensitive materials must protect such information appropriately and use it only for authorized purposes.

Partners are expected to:

- handle PTL-related information responsibly and securely;
- comply with applicable privacy, confidentiality, and information security requirements relevant to the services provided;
- limit access to authorized persons with a legitimate need to know; and
- notify PTL promptly of incidents or concerns that materially affect PTL information, systems, or services.

6. Fair Competition and Responsible Trade Practices

PTL expects partners to compete fairly and to comply with applicable competition, trade, sanctions, export, import, customs, and similar legal requirements relevant to the services or goods they provide.

Partners should not engage in collusion, price-fixing, misrepresentation, or other improper business conduct.

7. Conflicts of Interest

Partners should avoid situations in which personal, financial, or other interests conflict, or appear to conflict, with their work for PTL.

Any actual, potential, or perceived conflict that may affect PTL-related work should be disclosed promptly so that it can be reviewed and managed appropriately.

8. Responsible Use of Subcontractors and Third Parties

Where partners use subcontractors or other third parties in connection with PTL-related work, they are expected to do so responsibly and in a manner consistent with applicable contractual and legal requirements.

Partners remain responsible for the services they provide to PTL and for managing PTL-related risks within their areas of responsibility.

9. Accurate Records and Cooperation

Partners are expected to maintain accurate and honest records relating to PTL-related work and to provide information reasonably requested by PTL to assess compliance with applicable obligations.

Where required by contract or applicable law, partners are expected to cooperate with reasonable compliance reviews, investigations, or audit-related requests relevant to PTL-related services.

10. Reporting Concerns and Non-Retaliation

PTL encourages partners to report concerns relating to misconduct, legal violations, security incidents, unethical behavior, or other matters relevant to PTL-related work.

Reports may be made to management or Legal at legal@paytestlab.com.

PTL does not support retaliation against persons who raise concerns in good faith. Partners are expected to cooperate reasonably and honestly in connection with PTL reviews of reported concerns.

11. Consequences of Noncompliance

If a partner fails to meet the standards set out in this Code, PTL may take appropriate action consistent with the circumstances and applicable contract terms. Such action may include requesting corrective measures, limiting access, suspending work, or ending the business relationship.

Questions and Further Guidance

Questions about this Code or how it applies should be directed to management or Legal at legal@paytestlab.com.