

CODE OF CONDUCT

Advancing with Quantum Vision



WEBSPRING
COMPLETE MRO SOLUTION

AN ISO 9001 COMPANY

**MRO & GENERAL
ORDER SUPPLIER**

Our Vision and Value



Our Vision

Webspring. Advancing each generation.
Since 1912, the people of WEBSPRING have partnered to create innovative and sustainable solutions that move the world forward.



Our values

We live our values every day, everywhere, collaborating for the benefit of our customers, investors, employees, communities and partners.



Integrity

We are open, honest, and accountable.



Respect

We treat all people with dignity and provide a diverse, inclusive work environment.



Environment, health and safety

We work safely, promote wellness, and protect the environment and believing in sustainable business model.



Excellence

We relentlessly pursue outstanding and sustainable results.



Innovation

We creatively transform ideas into values.



Speak up

Contact anyone in our integrity help chain if you have questions or concerns about ethics or compliance at WEBSPRING:

- Your supervisor or team leader
- Human resource department
- Ethics and compliance organization
- Legal department
- Your integrity champion
- Integrity line
- Subject matter experts (e.g., Corporate, Finance, Audit, Procurement)

Message from the chairman/CEO

Colleagues,

Every WEBSPRINGian, everyday must live by our values. This serves as our moral compass, the way to achieve our true north. WEBSPRING Code is your roadmap for advising with integrity in sharing your live up to our high standards, and guiding you to do the "right things" where ever in the world we do business. Read it, refer to it, discuss it with your colleagues and incorporate it into the way you do business.

Sometimes, do right thing to do may not be so clear. In our business interaction, we may encounter difficult situation full of uncertainty and question. In those cases, additional resources - including this code of conduct - provide crucial guidance.

WEBSPRING mix mini resources available to you through our integrity help chain. you can talk to your supervisor team leader or organizations integrity champion when you have a question or concern. Or, call our integrity line to get advice or raise a concern. A full list of resources can be found on page 39.

Most importantly, I ask that you speak up and take action when you see something that conflict with your values. we each share responsibility for conducting business according to Webspring's highest ethical standards and the law.

By making integrity and all of our values and active part of your work life. You make WEBSPRING the company went it to be. Together, we will continue advising with integrity.



All the best,

CEO

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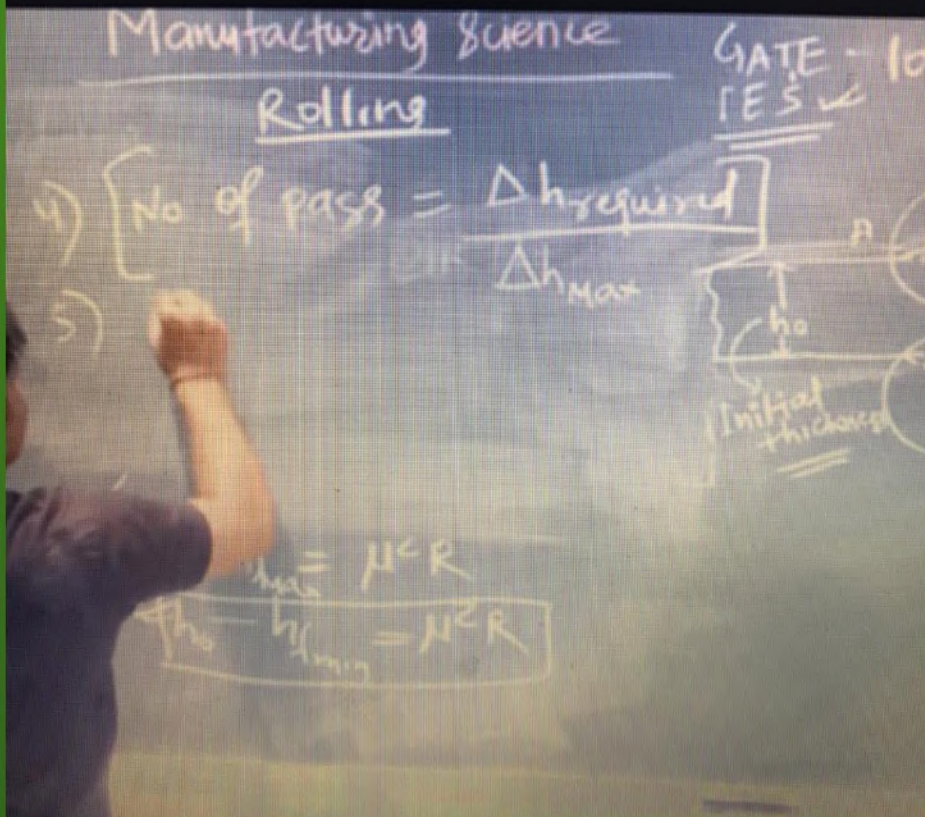
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Setting high standards



“When family and friends ask what you do for a living, I hope you tell them what WEBSPRING has done, and continue to do, advance each generation - and what an important role you play in making that happen. ”

- CEO.

The code of conduct ("Code") is our roadmap for advising with integrity. All of us are responsible for following the code and applicable laws and regulations, no matter where we are in the world. It applies to all employees, officers and directors of WEBSPRING Inc., its subsidiaries and entities it controls. violations of the code will not be tolerated and may result in disciplinary action or termination of employment.

If you encounter conflicts between our code or policies and the law, our business unit or location sets stricter guidelines that the code, we follow the highest standard. WEBSPRING's high standards are a competitive advantage - they help us to attract and retain customers, shareholders and world-class employees.

To maintain our high standards, we must each...



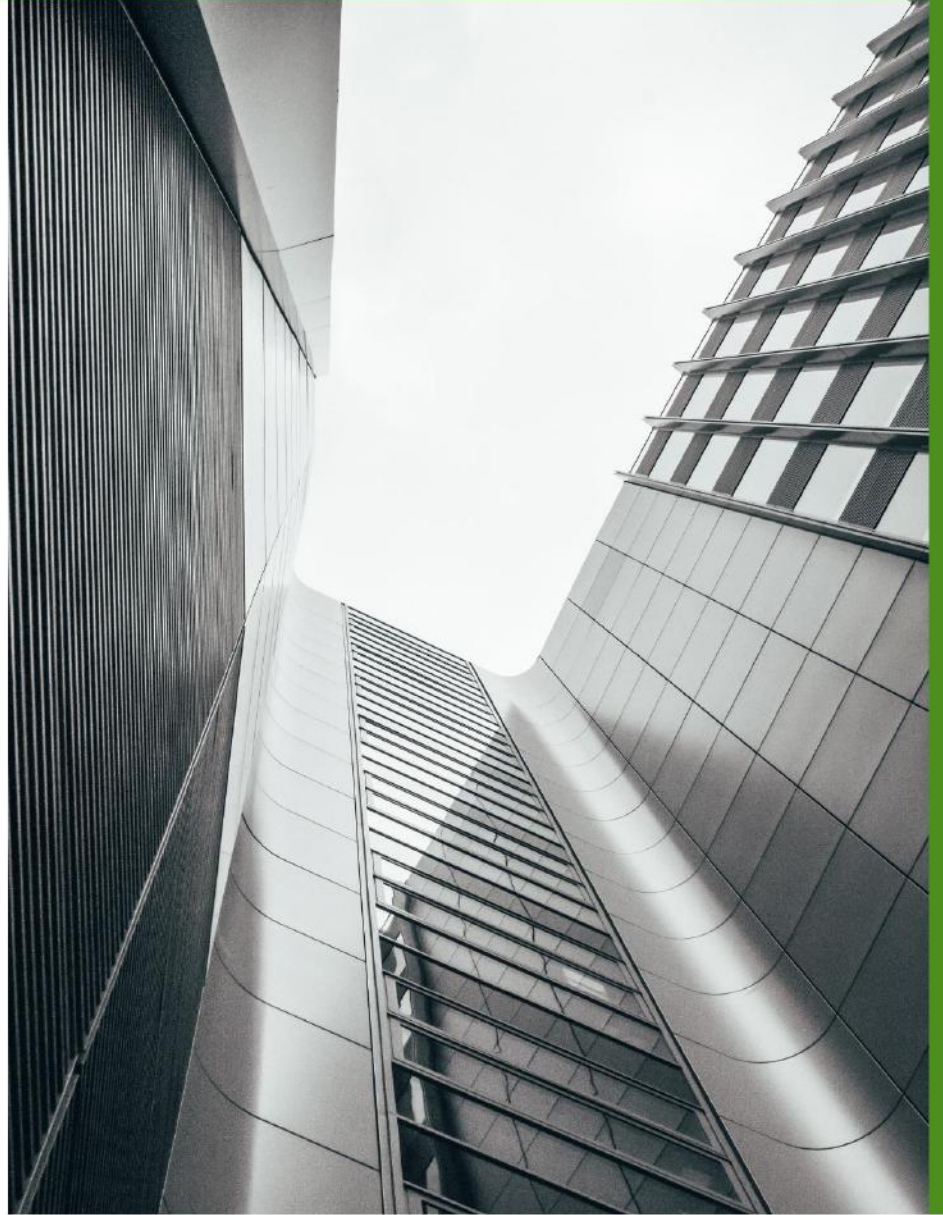
Conduct business with integrity - this means doing the right thing even when no one is looking.



Speak up and seek advice when you are not sure what to do.



Strive to be integrity leader every day.



Leading with integrity



★ OUR TRUE NORTH

Each of assets and example for others by acting with integrity. Our actions should reflect our commitment to WEBSPRING's value and to an open, honest and ethical work environment.

➡ HOW WE KEEP ADVANCING

- Create a work environment that promotes WEBSPRING's values.
- Know and follow the code, laws, regulations, and our policies and procedures.
- Set a personal example. Be honest and professional.
- Speak up if you have a question or concern. Each of us has a responsibility to promptly report any known or potential violation of our code or policies, any law or regulation.
- Promote a culture where all ideas and opinions are valued and questions and concerns are heard and addressed.

Seeking Assistance

You may find yourself in a situation that raises concerns or where the choice is not clear. WEBSPRING has many resources that can help you:

- Your supervisor and team leader
- Human resources department
- Ethics and compliance organisation
- Legal department
- Your integrity champion
- Integrity line
- Subject matter experts (e.g., corporate finance, audit, procurement)

Please see page 39 for additional help chain information.

Q

I am a supervisor on a hotline. My direct reports talk to me An ethical dilemma is facing. To be certain I am giving him a Guidance but I am not sure how I Respond. What should I do?

A

The code is always a good place to find your answer. If you cannot find the answer in then ask your manager for advice, but the main aim is to protect the confidentiality of the business if you are still unsure, contact any given resources listed in the code.

The integrity line is available globally for you to seek advice or raise a concern, 24

Subject to local law, contact the integrity line if

- Need advice or have a question
- Wish to raise an issue or concern
- Raised an issue and are concerned and are not satisfied
- Are not sure where to go for information
- Are uncomfortable using one of the other sources listed above

Independent companies receive all reported issues concerned and promptly direct them to WEBSPRING's compliance organisation for follow up. All questions and concerns are handled professionally and in a manner. Employee cooperation, honesty and truth are critical to our process.

You may remain anonymous when using the integrity line permitted by local law. Certain European countries topics you can report and your ability to report anonymously and ask a question.



Facing an ethical dilemma

When you are faced with the situation that does not feel right stop and consider this question:

- ➡ Is the solution aligned with the code and values?
- ➡ Is it legal?
- ➡ Is it in compliance with our policies, procedures and the code of conduct?
- ➡ Are there others I should consult before; I make a final decision?
- ➡ Would I be ashamed to tell my family, friends, colleagues or boss about my action?

You are not sure, STOP and SEEK ADVICE.

Prohibiting Retaliation

WEBSRING Has no retaliation policy. No one can take action against you for asking your question or raising a concern in good faith. Managers are responsible for ensuring that their teams understand this policy and comply with it.

You feel that you or any of your colleagues are beingaliated against, report it immediately. An employee who supports potential wrongdoing regarding a WEBSRING policy.

contract or sub contract has special rights and protections under us law. WEBSRING takes all allegations or retaliation seriously and will promptly and thoroughly investigate. If the company finds that retaliation occurred, appropriate disciplinary action will be taken.



Retaliation

If an employee has raised a concern any of the following action by a supervisor or anyone else may be retaliation:

- Termination
- Demotion to a desirable job, role or shift
- Unjustified negative performance evaluations
- Increase surveillance
- Denying training or mentoring opportunities
- Exclusion from team activities or key business discussions
- Harassment (see page 13)
- Threats

Q

A few months ago, I was contacted by the integrity line. I had found out that my team leader had awarded a large contract to a company owned by his brother. There was an investigation, and I believe that company took some disciplinary action. Since then, my team leader and some of my team members have stopped talking to me and have excluded me from business meetings. It is impacting my morale and my performance. Should I just keep quiet and hope that the situation improves?

A

No. The action of your team leader and team members may be retaliation and should be investigated. Contact any of the health chain resources listed in the court to report.



Work with one another



Operating Safely

“Absolutely nothing justifies putting your well-being or that of a colleagues at risk. Not delivery schedules, not overtime pay, not profits. Nothing is more important, more precious, than human life.”

CEO

★ OUR TRUE NORTH

Because we value human life above all else, we are committed to working safely and promoting wellness. We have our shared accountability and protecting ourselves and our colleagues by performing our jobs in a safe and responsible manner. No matter where you work or what your job is, put safety first. we strive for zero work related illness and injuries each year we will not compromise our environment, health and safety (EHS) values.

➡ HOW WE KEEP ADVANCING

- Know that zero is possible. Never deviate from the safe and proven method for performing a task. If you are unsure do not proceed stop and seek help.
 - Promptly report all safety related concern, deviation and incidents even if no one was injured.
1. Follow safe work practices and proactively seek to improve them.
 2. Ensure that you and your colleagues are working in safe, reliable and controlled conditions.
 3. Before you start work, make sure all safeguards are in place.
 4. Adhere to all work design plans, permits and safety operating limits.
 5. Keep our work environment clean, orderly and safe.
 6. stop work, or stop others, and seek help when you recognise and at-risk situation.

Q

I work in a plant. one of my colleagues does not always follow the energy isolation (lock-tag-verify) procedure before restarting a task. should I say something?

A

Yes. the process scheduler is in place to prevent hazardous energy from fatally or seriously injuring someone. by not following the procedure with your colleagues risk a life threatening injury. speak up, stop work and seek help.

Keeping a secure work in environment

★ OUR TRUE NORTH

A focused on safety include a commitment to maintain a secure work environment. every WEBSPRINGian plays an important role in actively supporting a workplace that is free of violence threats and intimidation.

Maintaining a drug free and alcohol free workplace.

★ OUR TRUE NORTH

Our work requires alertness accuracy and quick reflexes. Hulk ones are expected to perform their duties free from the influence of drugs and alcohol that can adversely affect safety productivity and judgement and can cause serious accidents. Illegal drugs controlled substances and misused over counter for prescriptions medication have on our workplace.

HOW WE KEEP ADVANCING

- Follow all building security rules for your site.
- Never bring a weapon to work. Weapon include, but are not limited to firearms, (guns) swords, explosives and any other item whose purpose or use it to cause harm.
- Never do or say anything that could cause someone to feel threatened or unsafe.
- report any suspicious persons, threats of violence, presence of weapons or any concerns you may have for your personal safety to your supervisor, human resources are local security as soon as possible.
- In Emergencies, follow local emergency reporting produce or contact the

Global Security Policy

HOW WE KEEP ADVANCING

- Report to work free from the influence of drug and alcohol
- Do not bring these substances to work used in or give them to others.
- Notify your supervisor if you are taking medication may affect your work
- Report it immediately if you believe it is illegal while impaired.
- Seek assistance through your look locations employee assistance, family support and counseling program if you have a drug or alcohol problem.



Treating other with Respect

★ OUR TRUE NORTH

Finding a talented and diverse workforce .Our company and its competitive advantage. Each of us plays an important role, an open an inclusive workplace where every individual is able to freely contribute Webspring's success. At WEBSPRING we accept our colleagues varied backgrounds culture and respective and value our differences.

➡ HOW WE KEEP ADVANCING

- Treat others fairly and with respect.
- Speak up if you see someone being treated unfairly for disrespectfully.
- Avoid actions that someone might consider bullying or harassment.
- If you are responsible for hiring firing pay decisions promotions or employee discipline focus solely on one person's qualifications abilities experience and performance.

Q

If colleagues offensive jokes at an outside dinner with a customer. Does the code apply?

A

Yes it applies to our work wherever we are. That includes what we do on WEBSPRING property and at off site meeting, business travel and business-related social activities.



What is harassment?

Harassment is an unacceptable hostile or offensive action directed against anyone and includes:

- Making in appropriate jokes for comments what you find to be funny may be offensive to others.
- Teasing UK league about his or her race, colour, religion, National origin, disability, sexual orientation, gender identity/ expression, vateran status, genetic information, sex or age
- Bullying
- Sharing unsolicited opinions about a person's sexual orientation or gender identity / expression.
- Making sexual advances or request for sharing sexually explicit or other inappropriate materials



CONDUCTING BUISNESS GLOBALLY



Preventing bribery and corruption

“ Putting policies and procedures in place is just the first step in safeguarding the company and ourselves against corruption. We all need to understand and apply them in all of our business dealings. ”

_CEO

★ OUR TRUE NORTH

We compete on the merits of our products and services and do not tolerate any form of bribery corruption regardless of local practice or custom. While global business laws are complex and can change, remember, no matter where in the world you work there is a lot of policy prohibiting bribery that applies to you.

➡ HOW WE KEEP ADVANCING

- Follow the WEBSPRING anti-corruption policy and proceed us and all relevant anti corruption laws including the US foreign corrupt practices act and the UK bribery act which apply to our activities worldwide.
- Understand how to recognise situations that can signal corrupt practices.
- Never offer or give a bribe or ask for accept a bribe
- Interact appropriately with government officials bribery laws are often stricter when working with government officials.

👤 What Is a Bribe

A Bribe Is Offering Giving Or Receiving Anything Of Value No Matter How Small In Order To Improve Personally Influence A Business Decision And Create An Unfair Business Advantage. This May Include:

- | | |
|---|---|
| ■ Cash, gift card or gift certificates | ■ Loans |
| ■ Gifts, entertainment and hospitality | ■ Political contributions |
| ■ Payment of travel expenses - specially when there is no clear business purpose for the trip | ■ Favors, such as "putting in a good word" for a child's private school application |
| ■ Personal services - Such as car service or personal chef | ■ Offers of employment |

- Follow WEBSPRING's due-diligence and contracting procedure for intermediaries when hiring others to act on webspring behalf. All intermediaries must be approved supervised and follow WEBSPRING's code of conduct.

i Anti-corruption policy; due diligence and contacting procedure for intermediaries

- Do not make facilitation or grease payments. these are small payments to government officials to increase them to perform actions they are already required to perform, such as key clearing goods through customs for issuing a permit. The sole exception is when you believe you are in imminent personal danger. in that case to what is necessary to safely remove yourself from the situation and promptly report it to WEBSPRING's legal department.

Who Is a Government Official?

We must never engage in any activity that could be interrupted as improperly influencing a government official. There are strict rules that apply to our dealings with government officials. There is status as government officials is not always obvious government officials include:

- Officials and employees at all levels of governments
- Military personnel
- Candidates for political office and political parties
- Employees of government owned or controlled businesses
- Employees and officials of public international organisation.



Acting Responsibly When Giving Or Receiving Gifts And Hospitality

★ OUR TRUE NORTH

Gifts and hospitality can help build goodwill and straighten a business relationship. These hospitality(Such as goods, Mementos, favors, benefits, honorarium, services, meals, recreations, entertainment, lodging, tickets, travel, offers of employment, etc.) Are common and expected in many cultures. At the same time they can create the or perceived concerns about personal integrity. Important to wide anything that creates an importance in business advantage or even appears to influence someone's business judgement.

- ❗ **Business conduct policies;**
Anti corruption policy;
Hospitalities and gifts procedure

➡ HOW WE KEEP ADVANCING

- Follow our hospitalities and gifts procedure and always use good judgement.
- Note that gifts and hospitality given to government officials require special approvals
- Politely decline any gift for hospitality that does not comply with our policies and inform your manager.

Q

Govinda has invited me to an information seminar about a new product followed by dinner and a hockey game. may I go?

A

it may be appropriate to attend the seminar if it is not lavish is reasonable and has a business purpose. Discuss the invitation with your manager before accepting. Remember if the vendor is currently completing for WEBSPRING business, then it is not appropriate to accept gifts hospitalities or entertainment while the decision is pending.



Some Rules Of The Road When You Want To Offer Or Accept A Gift Or Hospitality:

Proceed when gifts for hospitality are:

- Legal and consistent with our values local customs and policies of all parties involved
- Given for a legitimate business purpose
- Reasonable not lavish and not provided on a regular basis
- Approved and documented accurately in our business records

Stop when gifts for hospitality are:

- Cash or a cash equivalent such as a gift card or gift certificate
- Offered or received for the purpose of influencing a business outcome
- An embarrassment to you WEBSPRING or anyone else

Avoiding Conflicts Of Interest

★ OUR TRUE NORTH

We share our responsibility to avoid conflicts of interest. A conflict of interest occurs when our private interest or actions interfere - or appear to interfere - with the interest of the company. We must always be transparent about outside activities and relationships. Many conflicts can be avoided or resolved through

➡ HOW WE KEEP ADVANCING

- Recognise situations and personal relationships that might make it hard for you to be objective.
- Refrain from holding outside employment or business dealings that could interfere with the performance of your job at WEBSPRING.
- Never seize a business opportunity that you learn about through your work at WEBSPRING.
- If at any time you think you may have a potential or actual conflict of interest, disclose it promptly to your manager, WEBSPRING's legal department or ethics and compliance.

Q

My daughter works for webspring in another department. Could this be a conflict?

A

We have many situations where family members and others in close personal relationships work for a WEBSPRING. Since every situation is unique, you should report the situation to your manager as well as to ethics and compliance. In many cases, there is no conflict of interest; however, it is important to be transparent about the relationship.



**Business conduct policies;
Employee service on outside
For profit business procedure**



Competing Fairly And Legally

★ OUR TRUE NORTH

Open competition benefits our customers and communities. We compete for business aggressively, Honestly and solidly on the merits of our products and services. Competition and business laws are complex and failure to follow can have serious consequences for WEBSPRINGas and the individual involved.

Q

I would like to attend and industry trade association meeting. I know competitors will be there. Is there anything I need to look out for?

A

First discuss the meeting with your manager. you and your manager must weigh the value of attending against the risk associated with the expected contact with competitors. Be careful in all of your contacts at the meeting, even social events and casual conversations. Never discuss prices, costs, sales, profits, production levels or other competitive subjects. If they come up, stop the conversation and make it clear to all present that the topic is off limits. Leave and contact WEBSPRING's legal department

➔ HOW WE KEEP ADVANCING

- Understand how competition laws apply to your activities and seek guidance from WEBSPRING's legal department when you have questions.
- Obtain approval from your manager before you meet with competitors. This applies to professional associations, training, labour negotiations, joint ventures technical committees and supplier .

Communicate With The Competitor About

- Prices On Matters Affecting Price Such As Promotions, Credit Or Other Terms And Conditions
- Production Or Inventory Levels
- Bids For Our Bidding Process
- Dividing Production Sales Territory Products Customers Or Suppliers
- Aspects Of Sales Agreements Such As A Customer's Right To Sell Product

Do not engage in reception or costume age to get information about the competitors.



Compliance With Antitrust Laws Policy; Corporate Procedure: External Association And Organisations, Contacts And Meetings With Competitors.

Complying With International Trade Requirements

★ OUR TRUE NORTH

As Responsible Member Of The Global Business Community WEBSPRING Strictly Complies With All Us And International Laws Regulations And Alka Policies Relating To The Import And Export Of WEBSPRING Goods Technologies And Services For Both Military And Commercial Applications. Trade Compliance Knowledge Is An Essential Element Of Alcazares Business Planning Strategy Growth And Daily Activities. In All Cases, We Must Accurately And Openly Report Our Importance And Exporting Activities.

➡ HOW WE KEEP ADVANCING

- Stay current on trade compliance laws and regulations keeping in mind that the rules can change.
- Obtain required licences and approvals be factors exporting or importing products technology services. Know and follow the current restrictions.
- Trade and financial dealings with specifications individuals groups and organisations.
- Sales of certain products technologies and services, which can depend on their interest and intended users.
- Rules of engagement regarding business between U.S and non U.S person both United states and abroad



- Understand the anti boycott laws and regulations of United States and prohibit participation in boycotts condoned or authorised by the United States.
- Contact the trade compliance department if you receive any communication or other document with a request for information about a boycotted country or a blacklisted company.
- Protect the security of our products from the a product is ready for shipment, through the transportation chain, until it arrives as its intended destination.

i Export Import Compliance Policy;
US Import/Export Compliance
Program Procedure

Q

I work in research and development it and use a laptop when I travel for business. What precautions should I take?

A

Keep your laptop with you and secure at all times. When travelling to another country check with our trade compliance department. Remember, you cannot export restricted technology without the proper government export licenses and other government approvals.



What Is An Export?

A product across National borders is an export that may be subject to licensing and approval requirements trade Restrictions. Exports can also include:

- Information on technology across National borders- event to another I'll go on or a coworker at our plant who is travelling in another country.
- Sharing technical information of your office with anyone who is not a citizen for a permanent resident alien your own country (a "deemed export")
- Travelling outside the US with products or technology - including laptops and their content such as operating software and technical data.
- Giving access to export controlled technology to anyone who is not a citizen or a permanent resident in your country, including posting information on a website.

Preventing Money Laundering

★ OUR TRUE NORTH

We Comply with money laundering laws worldwide. Money laundering occurs when companies or individuals attempt to conceal or disguise the proceeds of unlawful activity by moving them in a manner that hides their source and makes them look legitimate. All of our operations must safeguard against the use of such funds to pay for Webspring goods and services.

➡ HOW WE KEEP ADVANCING

- When making payments or accepting funds from third parties, follow Webspring's financial policies and procedures.
- Contact Webspring's Legal Department if you suspect any improper activity.

i Anti- Corruption Policy

Cooperating With Government Requests And Investigations

★ OUR TRUE NORTH

Webspring cooperates fully with government requests and investigations.

➡ HOW WE KEEP ADVANCING

- Contact Webspring's Legal Department to discuss the appropriate handling of government investigations and visits as well as all government requests for Webspring records (other than routine requests that are a normal part of your job).
- Always provide accurate and truthful information in response to government requests.

Recognizing Money Laundering

Remain alert to situations that look suspicious or may indicate that someone is using or wants to use their transactions with Webspring for money laundering, such as;

- Requests for payments in cash or cash equivalents
- Payments made by third party for the benefit of a customer
- Unusual transfers to or from countries not related to the transaction
- Customers who are not open and transparent about their ownership or seem eager to avoid our recordkeeping requirements



Building Strong Partnership



Focusing On Quality

★ OUR TRUE NORTH

The quality of products and services we provide to our customers is critical to our continued success and sustaining profitable growth. Focusing on quality means meeting our customers' requirements and delivering products and services at the right quality levels, on time and at the agreed-upon cost.

➡ HOW WE KEEP ADVANCING

- Expect the same behavior from our suppliers that our customers expect from us.
- Comply with all quality control standards, customer requirement and product testing procedures.
- Speak up if you discover an actual or potential product quality or safety issue. "See something, say something."
- Refrain from changing products, parts, or service specifications, unless authorized by the customer and permitted by applicable regulations or commercial practices.

Fostering Positive Customer Relationships

★ OUR TRUE NORTH

We value our customers and treat them fairly. Our goal is to build honest and transparent relationship based on mutual trust. By finding ways to create value for our customers, when they win, we win.

➡ HOW WE KEEP ADVANCING

- Honor our commitments and contractual obligations.
- Communicate honestly about our products, services and prices.
- Listen to our customers and consider their points of view when making decisions.
- Strive to anticipate, respond to and meet or exceeds customers' expectations.

i Quality Policy;
Quality Community;

Q

We are going to miss the promised shipment date for an order of airplane landing gear parts because final product testing will not be completed in time. The customer has approved shipment of orders under these circumstances before. Can we ship this order without all the testing completed?

A

No, the sales contract with the customer requires that the product fully conform to all negotiated product specifications prior to being shipped. Documented customer approval must be obtained to ship product that is known to be nonconforming or for which required product testing is not complete.

Complying With Government Contracting Requirements

★ OUR TRUE NORTH

Special laws and regulations apply when we do business with the U.A.E. defense industry, government agencies and government – owned businesses. We fully comply with the specific requirements that apply to these transactions.

- Do not deviate from contract requirements without authorized government approval. Deviation includes unauthorized substitutions of processes, parts, or components.
- Consult with Webspring's Legal Department before extending an employment offer to a current or former government employee.

➔ HOW WE KEEP ADVANCING

- Provide current, accurate and complete information for government contract bids and proposals.
- Ensure that all timecards, entries, costs, claims and statement contract are accurate and complete.



**Contact with the U.A.E
Government Procedure;
U.A.E Government Contracts;
Requirements Procedure**



Building Honest And Fair Relationship With Suppliers

★ OUR TRUE NORTH

Our supplier's relationships are based on lawful, honest and fair practices. While we recognize and respect the different legal and cultural environments in which our suppliers operate, we only partner with the suppliers who follow ethical and sustainable practices wherever they are located.

➡ HOW WE KEEP ADVANCING

- Seek the best value proposition for Webspring, considering environmental, social and economic impact when buying goods and services.
- Use Webspring – approved suppliers with existing leveraged agreements when possible.
- Obtain competitive bids and negotiate in good faith, free of any conflicts of interest when selecting new suppliers.
- Make payments to the person or company that actually provides the goods or services, in a country that is related to the transaction.
- Keep supplier pricing confidential and do not share it with other suppliers for any reason.

i Commercial and Supplier Contract Authorization Procedure

- Contact email? Or the Integrity line if you suspect that a supplier is not complying with our standards.

Q

I am in charge of purchasing a product for Webspring. After a competitive bid, Supplier 'A' looks to be the best choice based on price, quality and terms. However, my boss has instructed me to contract with Supplier 'B', who bid at a higher price and on less favorable contract terms. He said that he has a close friend who works at Supplier B and they would like to have a Webspring's business. What should I do?

A

A) You are responsible for seeking the best value proposition for Webspring based on objective criteria. If you feel uncomfortable discussing your concerns with your supervisor, contact any of the

👤 Upholding Supplier Standards

We do business only with the suppliers that comply with applicable laws and never knowingly use a supplier that:

- Supplies unsafe products or services
- Use child labor or forced labor
- Used physical punishment to discipline employees, even if it is allowed by local law
- Does not operate in full compliance with the law and in an environmentally responsible manner



Protecting Information and assets



Respecting Privacy And Protecting Personal Information



OUR TRUE NORTH

We all have a responsibility to protect the personal information of our colleagues, customers, suppliers and others with whom we do business. Even within Webspring, personal information should be shared only with those who need it to perform their job. Adequate safeguards should be put in place to ensure the information is not disclosed to anyone else.

HOW WE KEEP ADVANCING

- Understand and follow all applicable laws, policies and procedures when working with personal information. This includes how it is collected, used, stored, shared, and deleted.
- If you accidentally disclose or receive personal information without authorization, promptly report it to Human Resources.
- If you become aware of a security breach that may have given someone unauthorized access to personal information, promptly report it to Human Resources and IT support.
- Webspring who purposely disclose or misuse personal information will be held responsible and may face disciplinary action and civil and criminal penalties.

I received a call from a vendor asking for the name, title and email address of employees in my department. She would like to extend a special sales promotion to these employees. Is it ok to share this information to her?

A) No. Information about our employees is confidential and should only be given to those who are authorized to have it. Contact Human Resources prior to sharing any personal information about our employees or customers

i Quality Policy;
Quality Community;



What is Personal Information?

Personal information includes anything that can be used to identify someone. Examples include:

- Contact information such as addresses and phone numbers.
- Government- issued identification numbers, such as Social Security, driver's license or national insurance number
- Compensation information, performance records contents of personnel files
- Medical information, leave requests, benefits enrollments and claims
- Credit card, debit card and financial account number.

Avoiding Insider Trading

★ OUR TRUE NORTH

Although Webspring may share information with certain employees to allow them to perform their jobs, we are not always ready to release that information to public. If you become aware of information that would be likely to affect the price of Webspring's stock or other securities once it becomes known to the public (material non-public information), you are considered to be an insider. Insider trading, and passing material non-public information to others, violates Webspring policy and may be illegal.

Q

I want to buy Webspring stock under a Webspring savings or other benefit plan. Do the insider trading rules apply?

A

Yes. You need to be alert to the insider trading rules whatever you buy or sell Webspring securities. You can only transfer money into or out of the Webspring stock fund in a Webspring savings plan or other benefit plan when you do not have material non-public information and there are no blackout

➡ HOW WE KEEP ADVANCING

- When you are an insider, do not buy or sell Webspring's securities until the information has been publicly released by Webspring.
- Never trade in the securities of any other company based on material non-public information about that company that was obtained through your work at Webspring until it has been officially released to the public.
- Do not share material non-public information with anyone else, including colleagues, family members or friends.
- Follow all blackout restrictions and guidelines that apply to your trades in Webspring securities.
- Consult with your supervisor or Webspring's Legal Department if you have any questions.

i Insider Trading Policy

Maintaining Accurate Books And Records

★ OUR TRUE NORTH

Accurate records are critical to making sound business decisions. Investors and the public count on Webspring to use and provide accurate information so they can make informed decisions. Our books, records and accounts must correctly reflect all transactions and activities and must meet applicable laws, regulations and standards, and comply with Webspring's Financial Management Handbook.

➡ HOW WE KEEP ADVANCING

- Ensure that all information and business records that you prepare, process or approve are accurate and complete and comply with applicable laws, standards and procedures.
- Never falsify a record or try to hide the true nature of a transaction.
- Do not try to bypass internal control and procedures, even if you think it would be harmless or save time.
- Always cooperate with Webspring's internal and external auditors and be open and honest with them.
- Never hide or destroy records to avoid disclosure in legal or government proceedings.
- Be familiar with our record management policies and retention schedules that apply to records and information in any format, including electronic and paper copies.
- Follow instructions that you receive from Webspring's Legal Department to retain documents, such as required holds in ongoing or anticipated litigation and government investigations or audits.

Q

My manager asked me to ship an order earlier than the customer's requested shipment date. He indicated that this would enable us to meet our sales goal for the quarter. Is it alright to proceed with the shipment?

A

No. We cannot recognize sales for goods shipped before the customer's requested shipment date. To change a shipment date, we must first obtain the customer's written permission. If your manager still insists you process the shipment, do not proceed and immediately contact one of the help chain resources listed in the code.

i

**Anti-Corruption Policy;
Financial Management Handbook;
Records Management Policy;
Records Management Procedure**

🖐️ What is Business Record?

The information and documents you create or use in your job are business records. Webspring's financial ledgers are one type of business record, but so are:

- Manufacturing reports and test results
- Safety records
- Expense reports
- Invoices
- Time records
- Email and voicemail communications



Using Property And Resources Responsibly

★ OUR TRUE NORTH

Each of us is responsible for safeguarding Webspring's assets- as well as the property and resources entrusted to us by our business partners. Responsible use of Webspring assets enables us to transform ideas into value, compete effectively, and maintain the trust of our stakeholders.

➡ HOW WE KEEP ADVANCING

- Protect all assets against theft, loss, damage or misuse.
- Do not take or use assets for your personal benefit, or for the benefit of others, without appropriate written permission.
- Ensure that assets are never used for illegal purposes.
- Label, classify, secure, handle and dispose of confidential information properly. Contact Webspring's Legal Department with questions or concerns about the use of intellectual property.
- Remember that your confidentiality obligations continue after you leave Webspring; all Webspring information must be returned before you leave.

👤 What is Confidential Information?

It is information that might benefit competitors and hurt Webspring if disclosed. Here are some examples:

- Information about our manufacturing processes, research and technical data
- Commercial information such as customer information, pricing, marketing plans
- Actual and proposed business plans and strategies, including product development
- Financial data
- Information related to employees

- Understand that information on Webspring computers, including emails, is Webspring property and will not be treated as private communication, except as required by law.
- Never ask new employees to provide confidential information from their previous work.

👤 Some Rules Of The Road When Asked to Supply Information

Proceed and share it when you are certain:

- The information is not confidential, sensitive or proprietary
- Your Webspring colleague needs the information to perform their job
- Your manager has authorized you to share the information and required confidentiality agreements are in place.

Stop when gifts for hospitality are:

- You do Know whether the information is confidential, sensitive or proprietary
- The information is labeled or classified as confidential

Ensuring Our Public Communications Accurate And Consistent

★ OUR TRUE NORTH

As a public company, Webspring is subject to rules and guidelines concerning our public disclosures of information. We Communicate appropriately with shareholders, securities analysts and the media, avoiding selective disclosures that would give some parties and unfair advantage. Only certain individuals are authorized to speak on Webspring's behalf.

➡ HOW WE KEEP ADVANCING

- Refer media requests and questions from investors or the financial community to a corporate affairs or Investors Relations representative.
- Avoid making statements when it might appear that you are speaking on Webspring's behalf.
- Before agreeing to participate in a trade conference or contribute comments for published articles, obtain approval from your manager, Corporate Communications, and in some cases, Webspring's Legal Department

Q

Last night, I saw inaccurate information about Webspring's plans and prospects in postings on the web. Can I respond and correct the record?

A

No. You should not respond unless you have been explicitly authorized to speak on Webspring's behalf. Instead, bring the posting to the attention of your manager, Corporate Communications, or Webspring's Legal Department.



**Financial Communication Policy ;
Social Media Policy**



USING SOCIAL MEDIA RESPONSIBLY

Websprings are expected to use common sense and abide by Webspring's Values when using social media. This applies to posts about Webspring business, people, markets, customers, suppliers, partners or activities.

- Read and follow Webspring's Social Media Policy.
- Remember that our Social Media Policy applies whether you are using Webspring's accounts and equipment or your own.
- Understand that privacy does not truly exist in the world so social media – posts can be copied, printed, forwarded, or archived.
- Report any online post or activity relating to Webspring that you believe is improper or not in accordance with our Values and/or policies.



Supporting Our Communities



Promoting Social Media Responsibility

★ OUR TRUE NORTH

Our business activities have a significant impact on the people, communities and ecosystems in which we operate. We must continually earn our right to operate by demonstrating our respect for the health of our communities, the environment and human rights. We understand the importance of having transparent and open dialogue with our community stakeholders, and we work to build a culture of trust.

➡ HOW WE KEEP ADVANCING

- Respect the local norms and customs of the communities where we operate.
- Strive to improve the quality of life and exercise care for the environment in all community dealings.
- Use the Webspring Community Framework when engaging with local stakeholders to ensure that we:
- Understand all stakeholder's issues and concerns
- Provide them with relevant information
- Align our business practices and our non-government partnerships with community priorities
- Contact Webspring Foundation for guidance on how your business or function can support worthy projects in our communities.

i Insider Trading Policy

Protecting The Environment

★ OUR TRUE NORTH

Webspring is committed to operating in a way that respects and protects the environment wherever we are located. We will not compromise environmental values for profit or production. We respond truthfully and responsibly to questions and concerns about our environmental actions and the impact of our operations on the environment.

➡ HOW WE KEEP ADVANCING

- Comply with all applicable laws, policies and environmental standards.
- Dispose of waste materials safely and in full compliance with all laws and with Webspring policies and requirements.
- Help identify ways to continue to improve our environmental performance.

Q

My supervisor asked me to follow a new waste disposal procedure, but I am not sure it is safe or even legal. What should I do?

A

Never guess when you are dealing with the environmental procedures. Check with your supervisor to make sure you understand the request. If you still have concern, contact local management, EHS or any of the help chain resources listed in the code.

Respecting And Valuing Human Rights

★ OUR TRUE NORTH

Webspring upholds the highest standards of respect for the protection of human rights for all stakeholders. We hold our employees and suppliers responsible for following these standards. Our policies communicate that we will not tolerate forced, compulsory or child labor or discrimination of any kind in our global operations. We respect all people who work for or with Webspring.

➡ HOW WE KEEP ADVANCING

- Never use child labor or forced labor in our business activities.
- Contact infoind@webspringglobal.com or the Integrity Line if you suspect that an Webspring supplier or other business partner is using child labor or forced labor in their activities.
- Respect the freedom of individual employees to join, or refrain from joining, legally authorized associations or organizations.

i Human Right Policy

Webspring is a participant in the United Nation Global Compact, a strategic policy initiative for businesses that are committed to aligning their operations and strategies with universally accepted principles in the area of human rights, labor, environment and anti-corruption.



Engaging in Responsible Political Activity

★ OUR TRUE NORTH

Webspring respects the rights of our employees and others to participate in political activities and encourages civil engagement. We are a diverse company and respect for this diversity in all its forms, including the political opinions of others, is essential to our success. We are committed to complying fully with all rules that apply to our participation in political activities.

➡ HOW WE KEEP ADVANCING

- If your location has created a political action committee that is permitted under local law, follow our policies when making your contribution to help ensure they comply with applicable laws.
- Consult with Webspring's Government Affair Department before you communicate with government officials, employees or officeholders.
- Ensure that any lobbying activities conducted on behalf of Webspring have been approved by Webspring's Government Affairs Department and comply with all applicable laws and reporting requirements.

✋ AVOID MAKING THESE MISTAKES...

- Using company time or resources in support of personal political activities
- Pressuring other Websprings to support your political views
- Using your position at Webspring to try to improperly influence suppliers, customers, or other business partners to support your political views
- Representing that Webspring shares your political opinions

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Where To Go For Assistance

Policies and Procedures

Corporate policies and procedures are located on our website.

Integrity Help Chain Resources

For more information on the Code or our expectations, contact any of the following resources directly:

Your supervisor or team leader

Human Resources Department

Ethics and Compliance Organizations

Email : infoind@webspringglobal.com

Mail :

**M/S Webspring Private limited Company
Cross Road No.1/c, HOUSE NO.6,
P.O.- Azadnagar, Jamshedpur**

Legal Department

Your integrity Champion

Integrity Line

Website address;

Subject matter experts (e.g., Corporate Finance, Audit, Procurement)

Integrity Line Telephone Number **+91 99050 73289**



The code of conduct is a publication of Webspring's Ethics and Compliance Organizations

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