

Dinsm^ôre

Vendor Code of Conduct

Dinsmore & Shohl, LLP (“Dinsmore”) is a full service national law firm, established in 1908, and headquartered in Cincinnati, OH, with over 25 offices across the United States. To ensure the integrity of its relationships and business partnerships, Dinsmore expects all of its vendors to align with and adhere to the obligations of this code. For the purposes of the code, “Vendors” shall refer to all businesses, persons, and other organizations engaged to provide services or goods to Dinsmore.

Compliance and Ethics

Vendors must follow the law in all aspects of their business organization and operations. Dinsmore expects vendors to be aware of all applicable laws and regulations in the jurisdictions in which they operate, and to comply with them. Vendors should treat codified laws and regulations as a minimum standard, and follow other applicable compliance norms and industry principles whenever possible.

Dinsmore prohibits vendors from engaging in bribery or corruption. Vendors must comply with applicable anti-bribery and anti-corruption laws and regulations including, but not limited to, the U.S. Foreign Corrupt Practices Act. Vendors shall not provide or promise lavish gifts, entertainment, or favors to Dinsmore or other clients' employees with the intent of inappropriately influencing business decisions.

Vendors shall comply with all applicable financial regulations and follow accounting best practices. They must have the proper controls in place to ensure they do not partake in, facilitate, or enable illegal activities such as fraud, tax evasion, insider trading, and money laundering.

Conflicts of interest are prohibited. Vendors may not allow personal interests to influence their business decisions or service delivery.

Vendors must maintain adequate and accurate records, including those related to their business with Dinsmore. All records must be retained for the appropriate amount of time, and follow any specified retention requirements.

Data Protection

Dinsmore expects that vendors place the highest importance on the confidentiality and secure management of Dinsmore's data, and that of its clients..

Vendors must maintain a program with the people, process and technology to appropriately protect any confidential information of Dinsmore and its clients which may be disclosed or transmitted to the vendor. Confidential information includes, but is not limited to, personal information, financial information, protected health information, trade secrets, and intellectual property. Disclosure and handling of confidential information must be limited to only those with a reasonable need to know and the data may be used only for the business purposes the vendor was engaged to complete. Vendors may not share any confidential information with third parties without first obtaining Dinsmore's written approval, and must enforce these same data protection standards with the approved third parties.

If any confidential information is disclosed to an unauthorized party, the vendor must immediately contact vendorriskmanagement@dinsmore.com to provide notification of the incident, and cooperate with any resulting investigation.

Labor and Human Rights

Dinsmore expects each vendor to maintain an environment that promotes fair labor practices and treats all of its personnel with dignity and respect. Vendors must adhere to all applicable labor laws, provide commensurate wages, benefits, and working hours, and ensure freedom of association for its workforce.

Vendors must ensure they are upholding basic human rights, that their operations are devoid of forced labor, and that they are not facilitating or enabling coerced labor or trafficking in their supply chains. Similarly, child labor is prohibited, and vendors may employ only those of legal working age in the jurisdictions in which they operate.

Diversity, Equity, and Inclusion

Dinsmore expects and encourages vendors to value diversity and be committed to providing an inclusive culture for its attorneys and staff, with no tolerance for any forms of discrimination, and to make genuine efforts to advance diversity initiatives, and maintain adequate anti-discrimination and equal opportunity policies and practices.

Health, Safety, and Environmental Sustainability

Vendors must protect the health and safety of their workers and comply with all applicable laws, regulations, and industry standards in order to manage safety risks and prevent workplace accidents and injuries.

Vendors must also comply with any applicable environmental laws and regulations, and ensure that environmental sustainability is considered as part of their social responsibilities. Vendors should be aware of the ecological effects of their operations, and take meaningful steps to reduce their impact on the environment.

Reporting

Vendors shall not retaliate against any personnel who raise good faith concerns about unethical business practices, or violations of applicable laws and regulations.

If, at any time, vendors or vendor personnel become aware of any violations of this Code, they must immediately notify vendorriskmanagement@dinsmore.com.

Failure to comply with this Code or applicable laws and regulations, and to report potential violations, may result in termination of Dinsmore's relationship with the vendor.