

# Code of Ethics and Business Conduct

## From Our Solutia CEO

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Solutia, s.r.o. is recognized as one of the leading companies in our industry, driven by our unwavering commitment to delivering high-quality products and services while championing ethical business practices that go beyond legal compliance. We are dedicated to ensuring all employees align with our organization's mission and vision.

The Solutia Code of Ethics and Business Conduct is a key tool in supporting this alignment. This essential document defines, articulates, and enforces the company's core values. It serves as the foundation of our corporate culture, built on integrity, transparency, and accountability.

The Code outlines critical principles to guide all employees in understanding Solutia's values and their professional responsibilities. Every employee is required to read and fully understand the Code to make sound, ethical decisions that align with our corporate policies and expectations.

Adhering to the Code is not optional. We must uphold Solutia's standards by demonstrating ethical behavior in all business activities and professional interactions. Compliance with the Code is a collective responsibility and essential to maintaining our organization's highest standards of conduct.

We thank each of you for your continued commitment, dedication, and integrity. Together, we make Solutia a trusted and respected leader in our field.

Prague, March 9th, 2025

**solutia**  
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**Martin Milý, CEO**

## 1. Introduction

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This Code of Ethics and Business Conduct applies to all employees, resellers, and anyone engaged in further providing our services. Solutia, s.r.o. requires that all activities within the company comply with all applicable laws, regulations, and this Code.

Our company conducts periodic training programs and systematic reviews for our employees to ensure compliance with the conduct code. To our company, compliance with laws, regulations, and business practices means observing the law and conducting corporate business in a way that recognizes our ethical responsibilities and fulfills them.

Solutia maintains open and frank business dealings and strives to develop mutually beneficial relationships. Our company expects all its employees to adhere to high ethical standards and to avoid engaging in any activity that involves even the appearance of impropriety.

## 2. Antitrust and Competition Laws

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Solutia is committed to observing the applicable antitrust or competition laws. All of Solutia's personnel are always required to comply with these laws.

## 3. Improper Payments, Money Laundering, and Economic Boycotts

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In Solutia, our colleagues cannot offer or pay bribes. They are prohibited from offering, promising, authorizing, directing, compensating, 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 Solutia or themselves. Our company also prohibits all forms of money laundering involving disguising, channeling, receiving money inappropriately, 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
- Solutia employees
- Any other third-party

Solutia prohibits giving money or anything of value directly or indirectly to a government official or employee of a state-owned enterprise or the spouse, significant other, child, or another relative of any

such person to influence or reward an action or decision of the Government or public sector employee or official or to gain any improper advantage for Solutia.

"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. Solutia 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.

## 4. Dealing with Government

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All personnel employed 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.

## 5. Lobbying of Government Officials

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Lobbying is generally any activity that attempts to influence laws, regulations, policies, and rules. However, in certain jurisdictions, the legal definition of "lobbying" can also cover procurement and business development activity. Solutia's employees are responsible for understanding when their actions may legally have been considered lobbying in a particular jurisdiction and comply with all applicable laws.

Our employees may not lobby the Government on behalf of Solutia. Government relations consultants/lobbyists retained by you may not be used by Oracle, and you may not use Oracle's consultants/lobbyists for any such purpose.

## 6. Business Courtesies that May Be Extended

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Solutia employees must use discretion and care to ensure that expenditures on customers or representatives are reasonable, ordinary, and proper. Solutia's employees also must ensure that spending could not reasonably have been construed as a bribe or an improper attempt to secure unfair preferential treatment or violate applicable laws and regulations. A general guideline for evaluating whether a business courtesy is appropriate is to ask whether public disclosure could be embarrassing to you, Solutia, or the recipient.

## 7. Business Courtesies that May Be Received

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Solutia's employees are responsible for ensuring that acceptance of any business courtesies, gifts, or entertainment is proper and could not reasonably be construed as an attempt by the offering party to secure favourable treatment or otherwise violate applicable laws and regulations.

## 8. Financial Integrity

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Solutia's employees must accurately document all transactions related to your contract with Oracle and relevant order forms in your financial books, records, statements reports, and other documents provided to Oracle and prevent side agreements, whether oral or written. The handling and disbursement of funds related to Oracle business transactions must be according to a duly authorized written Oracle contract with clearly defined procedures. Documents must not be inappropriately altered or signed by those lacking proper authority. No undisclosed or unrecorded fund or asset related to any Oracle transaction may be established or maintained for any purpose.

Solutia's financial books, records, and statements properly document all assets and liabilities and accurately reflect our company's transactions related to provided products and services. Our business records have been preserved following the record retention policies and all applicable laws and regulations. Solutia has established and maintained internal financial and other controls that ensure that your transactions have been executed, your expenditures are under the appropriate authorization, and that you spend money responsibly and appropriately.

Solutia's policy reports its financial results and other significant developments thoroughly, reasonably, timely, and understandably.

All approval requests for nonstandard discounts must be accurate and commercially justified by Solutia authority. Any approved value or benefit must be used only for disclosed and authorized purposes. Structuring a transaction to create additional margin for any undisclosed or unapproved purpose is never allowed, including paying or rewarding a Solutia customer, employee, or another third party.

Placing an order with Solutia without the existence of a corresponding end-user agreement (also known as "pre-loading" or "channel stuffing") is not an acceptable Solutia business practice and is prohibited. Solutia's employees only submit an order to Oracle or an Oracle Value Added Distributor (VAD) after receiving an order from an end-user for the same programs, hardware, learning credits, cloud services, and services. Any request by an Oracle employee to do otherwise must be immediately reported to the Oracle Legal Department. You may not allow an order to be placed with Oracle to distribute Oracle programs to an end-user unless you have received an order from an end-user for the programs or unless you have a specific authorized agreement or arrangement with Oracle.

## 9. Intellectual Property and Obligations of Confidentiality

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Solutia respects others' intellectual property rights and expects other companies to respect Solutia's intellectual property rights. A vital element of such protection is maintaining the confidentiality of Solutia's trade secrets and proprietary information. Solutia's intellectual property, confidential information, patented technology, documentation, or other materials must not be used without written permission or outside the work scope performed for Solutia. Additionally, copyrighted software must not be reproduced. While working with or for Solutia, employees must not use proprietary information, patented technology or copyrighted software, documentation, or other third parties' materials without authorization.

Solutia's employees must safeguard confidential information by not transferring, publishing, using, or disclosing it other than as necessary in the ordinary course of business to perform your work for Oracle or as directed or authorized by Oracle. Solutia's employees must observe applicable data privacy standards. Materials that contain confidential information or protected by privacy standards should be stored securely and shared only internally with employees on a need-to-know basis.

Confidential information may include, but is not limited to: source code, software and other inventions or developments (regardless of the stage of development) created or licensed by or for vendors, marketing and sales plans, competitive analyses, product development plans, nonpublic pricing, potential contracts or acquisitions, business and financial plans or forecasts, internal business processes and practices, and prospect, customer, and employee information.

## 10. Securities and Insider Trading Laws

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Solutia's employees are obligated to comply fully with applicable insider trading and securities laws, which govern Oracle's securities' transactions. Securities include common stocks, bonds, derivatives (for example options, futures, and swaps) and other financial instruments.

Accordingly, state securities' laws and regulations prohibit Solutia's employees from using material nonpublic information (also called "inside information") for personal advantage and disclosing this information to any other person before it is broadly available. You expose yourself and your company to civil and criminal liability if you or members of your immediate family trade securities while you possess inside information or if you provide any person or entity with such data for their use in securities trading.

If we possess material, nonpublic information gained through our relationship with Oracle, we are not trading in Oracle securities or the securities of another company to which the information relates. We may not pass on material nonpublic information to others (that is, "tip"). Again, these restrictions also apply to our immediate family members.

Material information is any information that a reasonable investor would consider necessary in a decision to buy, hold, or sell securities. It includes any information that could reasonably be expected to cause a change in Oracle's securities price or the protection of another company to which the information relates. Material information may include financial performance and operating metrics (mostly quarterly and year-end earnings) or significant changes in economic performance, operating metrics, or liquidity (including forecasts); potential or ongoing significant mergers, acquisitions, joint ventures, divestitures, or other strategic transactions; award or cancellation of a substantial contract or strategic partnership; fundamental management changes; changes in dividend or stock repurchase programs, offerings of securities, or credit transactions; changes in auditors, knowledge of qualification in an auditor's opinion or report, or any difference in the ability to rely on prior auditor reports; actual or threatened significant litigation or investigations; or the gain or loss of a substantial customer or supplier.

Nonpublic information is material information that is not available to the general public. It is typically made public through the issuance of a press release or a filing with the Government.

## 11. Trade Compliance Laws and Regulations

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Government trade laws and regulations govern all imports, exports, re-exports, and use of US-origin commodities and technical data, wherever located. Oracle requires that we 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. We 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 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.

## 12. Conflicts of Interest

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The term "conflict of interest" describes any circumstance that could doubt our ability to act objectively concerning Oracle products and services distribution. Oracle wants its Partners' loyalty to be free from conflicts of interest. Conflict of interest situations may arise in many ways. If Solutia's employees feel that they have an actual or potential conflict with Oracle or any of its employees, they must report all pertinent details to Oracle.

## 13. Contracting

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Solutia and its employees commit to competing fairly and ethically for all business opportunities. Furthermore, our employees involved in the sale or licensing of products/services, negotiating agreements, or delivering services to customers understand and honour the terms of contractual agreements. We ensure that all statements, communications, and representations to customers are accurate and truthful.

## 14. Advertising and Marketing

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Unfair methods of competition and deceptive practices are prohibited. Examples of these include making false or misleading statements about your or Oracle's products or services, falsely disparaging an Oracle competitor or its products or services, making product or service claims without facts to substantiate them, or using Oracle's or another company's trademarks in a way that confuses the customer as to the source of the product or service.

## 15. Business and Employment Relationships

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Solutia company affirms the principle of equal employment and business opportunities without regard to any protected characteristic, including but not limited to race, religious creed, national origin, color, sex or gender, gender identity or expression, age, mental or physical disability, mental condition, pregnancy, marital status, national origin/ancestry, genetic information, political affiliation, military and protected veteran status, sexual orientation, or any other characteristic protected under federal or state law or local ordinance. Oracle policy prohibits harassment in any form, and Oracle expects that we practice and promote a work environment free from harassment, as appropriate under local laws.

## 16. Human Rights of Workers

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Our company commits to upholding the human rights of workers and treats all employees with dignity and respect. Compliance with fair labor and antislavery practices that allow for freely chosen employment is required, including the prohibition of child labor, human trafficking, and slavery. In Solutia, adherence to applicable wage and labor laws and standards is necessary. Physical abuse, sexual or other harassment, and discrimination based on race, religious creed, caste, national origin/ancestry, genetic information, religion, age, disability, gender, gender identity or expression, pregnancy, or marital status are strictly prohibited.

## 17. Environment, Health, and Safety

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Solutia recognizes its social responsibility to protect the environment and expects its colleagues to share its commitment. All personnel employed must comply with all applicable environmental laws and regulations and are expected to reduce the consumption of resources, including raw materials, energy, and water, throughout all product or service lifecycle. In Solutia, our colleagues are encouraged to reduce or eliminate waste of all types by implementing appropriate conservation measures in our facilities and recycling, re-using, or substituting materials.

Worker health, safety, and well-being are also crucial to Solutia. Therefore, our company strives to provide and maintain a safe and healthy work environment and fully comply with all applicable safety and health laws, regulations, and practices while minimizing our operations and products' environmental burden. We take adequate steps to mitigate the causes of hazards inherent in the working environment, prevent workplace accidents and injuries, and promote safe and healthy workplaces.

## 18. Duty to Cooperate

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Solutia's employees are supposed to cooperate with Oracle's periodic requests for documents and information made in connection with Oracle's partner onboarding and due diligence processes. To ensure that our partners adhere to Oracle's policies, we may be requested to provide certain

information identifying your company structure, the potential existence of conflicts of interest, and compliance with the US and local state laws. However, Oracle may require that partners comply with all applicable local and US regulations and requests for information to identify several specific compliance issues, which would need to be resolved before a partner can participate in discounts or benefits associated with Oracle's distribution promotion products. You are obligated to provide truthful and accurate responses to such requests for information and Oracle reserves the right to request additional information at any time. Oracle may terminate your membership or distribution rights for failure to satisfy your obligation of providing truthful and accurate responses to such information requests.

Additionally, our company might be anticipated to cooperate with any audit request made by Oracle as required by your Oracle Partner Network Agreement or any Distribution Agreement.

## 19. Reporting Violations

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We might be anticipated to report to Oracle any conduct, including any Oracle employee's conduct, that you believe in good faith to be an actual, apparent, or potential violation of this Code. Prompt reporting of violations is in everyone's best interest. Reports will power be handled as confidentially as possible. Oracle expects all partners to provide reasonable assistance to Oracle with any investigation into violating this Code or applicable law.

Solutia maintains an open-door policy concerning your questions, including any related to ethics and business conduct. To report an incident, you may contact Oracle's legal counsel.

## 20. Enforcement

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The Code of Ethics and Business Conduct places Solutia and vendors at the forefront, with corporations emphasizing the importance of solid business ethics and honest business conduct. The vendor's standards can be met only with cooperation. Solutia trusts that we will adhere to the standards of this Code. According to applicable laws and without any liability to the vendor, any violation of this Code might constitute the base for the immediate termination of our partnership agreements with the vendor and the cancellation of any pending fees payable to you.

In Prague, March 9<sup>th</sup>, 2025