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Code of ethics policy

This Code of Business Conduct and Ethics helps ensure compliance with legal requirements and our business conduct standards. All business activities and transactions conducted at or via Prime B2B LLC are expected to operate under the highest degree of ethics. Employees and business consultants are expected to read and understand this Code of Business Conduct and Ethics, uphold these standards in day-to-day work activities, comply with all applicable policies and procedures, and ensure that all agents and contractors understand and adhere to this standard.

Policy brief & purpose

Our professional Code of ethics policy aims to give our employees and contractors guidelines on our business ethics and stance on various controversial matters. We trust you to use your better judgment, but we want to provide you with a concrete guide you can fall back on if you're unsure about how you should act (e.g., in cases of conflict of interest). We will also use this policy to outline the consequences of violating our business code of ethics.

Scope

This policy applies to everyone we employ at Prime B2B or have business relations. This includes individual people such as employees, interns, volunteers, and business entities, such as vendors, enterprise customers, or venture capital companies.

Note that our Code of ethics is slightly different than our Code of conduct. Code of conduct may include dress code and social media use, while our professional ethics code refers to legally or morally charged issues. Still, these two codes do overlap.

Policy elements

What is meant by the Code of professional ethics?

First, let's define professional ethics: they are a set of principles that guide people's behavior in a business context. They are essential to maintaining the legality of business and a healthy workplace.

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So what is a *code* of ethics? Our code of ethics definition refers to the standards that apply to a specific setting – in this case, Prime B2B as an organization.

What is the purpose of a professional code of ethics?

Having our business ethics in writing doesn't mean that we at Prime B2B don't trust our employees. We strive to hire ethical people who have their standards, so we expect that a written code won't be necessary most of the time.

The components of our code of professional ethics:

We at Prime B2B base our business code of ethics on common principles of ethics and values.

- **Respect for others.** Treat people as you want to be treated.
- **Integrity and honesty.** Tell the truth and avoid any wrongdoing to the best of your ability.
- **Justice.** Make sure you're objective and fair and don't disadvantage others.
- **Lawfulness.** Know and follow the law – always.
- **Competence and accountability.** Work hard and be responsible for your work.
- **Teamwork.** Collaborate and ask for help.

Here's a more detailed overview of our code:

Respect for others

It's mandatory to respect everyone you interact with. Be kind, polite, and understanding. You must respect others' personal space, opinions, and privacy. Any **violence** is strictly prohibited and will result in immediate termination. You're also not allowed to harass or victimize others. This includes sexual harassment, which is defined as behavior characterized by the making of unwelcome and inappropriate sexual remarks or physical advances in a workplace or other professional or social situation.

If someone, be it a customer, colleague or stakeholder, is offensive, demeaning, or threatening toward you or someone you know, report them immediately to your manager/corporate executive. You can also notify rudeness and dismissiveness if they become excessive or frequent.

Integrity and honesty

First, always keep in mind that Prime B2B's mission. We all work together to achieve specific outcomes. Your behavior should contribute to our goals, whether financial or organizational.

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Be honest and transparent when you act in ways that impact other people. We don't tolerate malicious, deceitful, or petty conduct. Lies and cheating are huge red flags and, if you're discovered, you may face progressive discipline or immediate termination depending on the damage you did.

Stealing from the company or other people is illegal. If you're caught, you will face repercussions depending on the severity of your actions. For example, suppose you steal office supplies. In that case, you may receive a reprimand or demotion (at a minimum), while if you steal money or data (e.g., engaging in fraud or embezzlement), you will get fired and face legal consequences. The decision is at Prime B2B's discretion on a case-by-case basis.

Conflict of interest

Conflict of interest may occur whenever your interest in a particular subject leads you to actions, activities, or relationships that undermine our company. This includes situations like using your position's authority for your gain or exploiting company resources to support a personal money-making business. Even when you seemingly act to the company's advantage, you may disadvantage it. For example, suppose an employee uses dubious methods to get competitor intel and raise their sales record. In that case, their action will positively impact the company's revenue, but it will put us at legal risk and promote unhealthy business practices.

If it turns out you have created a conflict of interest for yourself, you get fired. If the conflict of interest was involuntary (e.g., buying stocks from a company without knowing they're a competitor), we will take action to rectify the situation. If you repeat the offense, you will be terminated.

Justice

Don't act in a way that exploits others, their hard work, or their mistakes. Give everyone equal opportunity and speak up when someone else doesn't.

Be objective when making decisions that can impact other people, including when you're deciding to hire, promote or fire someone. Be sure that you can justify any decision with written records or examples. Seek and use the most objective methods in any case; for example, when interviewing



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candidates, ask the same interview questions and avoid judging non-job-related criteria, like a dress, appearance, etc.

Also, don't discriminate against people with protected characteristics, as the United States law forbids this. If you suspect you may have an unconscious bias that influences your decisions, ask for help from Prime B2B executives who will commit to securing support via HR professionals for guidance.

When exercising authority, be fair. Don't show favoritism toward specific employees, and be transparent when you decide to praise or reward an employee. Please note that it is Prime B2 B's policy that forbids you from having a reporting relationship with a relative.

Be just toward customers or vendors, too. If you think our company was wrong in a specific instance, don't try to cover it up or accuse the other side. Discuss with your manager to find solutions that can benefit both sides.

Lawfulness

Prime B2B is obliged to follow all laws which apply to our organization, and we hold our contractors to the same standard. We also follow all legal restrictions set by our client's professional limits.

When you're preparing contracts, clauses, disclaimers, or online copy that may be governed by law (such as consent forms), we may ask for a verification form before finalizing any agreement.

Our confidentiality policy covers prime B2B, our partners, and contractors. Prime B2B Does must not expose, disclose or endanger information of customers, employees, stakeholders, or our business. This includes our best efforts in regards to cybersecurity.

Following laws regarding fraud, bribery, corruption, and any assault is a given. Prime B2B is obliged to follow regulations on child labor and avoid doing business with criminal organizations.

Competence and accountability

At Prime B2B we all need to put a healthy amount of effort into our work. Not just because we're all responsible for the organization's success, but also because slacking off affects our colleagues.

Incomplete or slow hinders people's work and goes against all efforts in being true to our work commitment and the commitment we make to our business partners. Not putting a substantial work

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effort into our work and responsibilities comes in direct conflict with our respect and integrity principles.

We also expect you to take up learning and development opportunities, either on-the-job or via educational material or training. If you are unsure how you can achieve this, have an open discussion with your manager.

Take responsibility for your actions. We all make mistakes or need to make tough decisions, and it's essential we own up to them. Failing to be accountable regularly will result in termination.

Teamwork

At Prime B2B we believe that working well with others is a virtue rather than an obligation. You will certainly get to work autonomously and focus on your projects and responsibilities and, you should also be ready to collaborate with and help others.

Be generous with your expertise and knowledge. Be open to learning and evolving. If days go by without you consulting or brainstorming with anyone, you miss out on opportunities for excellence. Instead, work with others and don't hesitate to ask for help when you need it.