



ETHICS POLICY

Overview

At NVolve Technologies, Inc. ("NVolve"), we are committed to achieving our business goals with integrity and high ethical standards, and in compliance with the law. This Ethics Policy (or "Policy") sets out principles, guidelines, and expectations to help us conduct our business in a way that is honest, ethical, lawful, and above reproach.

The Policy applies to all NVolve employees, contractors and to the members of our Board of Directors and Board of Advisors (or "Board members"). It also applies to our relationships with subcontractors, vendors, service providers, business partners, and the employees of our joint ventures. Unless stated otherwise in the Policy, "NVolve," "us," "we," and "our," refer to NVolve and its subsidiaries. Violations of the Policy may be grounds for discipline, including termination of employment or relationship with NVolve.

When in Doubt, Ask

Although the Policy covers many different situations, there may be times where the right thing to do is unclear. In these times, use the principles in the Policy and consider a few simple questions: Is this action in line with NVolve's values?

1. Is it legal?
2. Even if legal, is it ethical?
3. Could it endanger anyone's health or safety?
4. Is it fair?
5. Would I be comfortable if my family and friends knew about it?
6. How would it look in a front page newspaper article?

Any actual or potential violation must be promptly reported. All reports made to a supervisor—and any information gathered during an investigation—will be kept confidential to the fullest extent possible. Please see the confidentiality policy in the "Reporting and Compliance" section. The Policy prohibits any retaliation for the good faith reporting of misconduct or concerns, asking questions, or cooperating with an investigation. Promptly report any retaliation to an immediate supervisor.

Compliance with Laws and NVolve Policies

Compliance with all laws, regulations, and NVolve policies is required at all times. Anyone who conducts any business activities for us must understand and follow the laws, regulations, and NVolve policies that apply to those activities. This includes NVolve policies that support our sustainability commitments as well as other NVolve policies, as updated from time-to-time.

Equal Opportunity; No Discrimination

We are committed to maintaining a work culture that treats all employees fairly and with respect and provides equal opportunities based on merit. Our employment policies prohibit discrimination based on race, color, religion, national origin, ancestry, familial status, age, veteran status, physical disability, mental disability, medical condition, gender, gender identity, sexual orientation, marital status, or any other legally protected status.

In addition, we are committed to following the letter and spirit of all anti-discrimination laws that apply to our business, including the Federal Fair Housing Act (which prohibits discrimination in home sales and lending services), the Americans with Disabilities Act, and all state and local fair housing ordinances. for discipline, including termination of employment or relationship with NVolve.

No Harassment

Our employees, Board members, business partners (and their employees), and service providers must not engage in:

1. Sexual harassment;
2. Harassment on the basis of race, color, religion, national origin, ancestry, familial status, age, veteran status, physical disability, mental disability, medical condition, gender, gender identity, sexual orientation, or marital status;
3. Any other form of harassment prohibited by law or regulation.

All employees must participate in our training programs on identifying, preventing, and reporting harassment in the workplace.

Bribe Prohibition; Duty to Report; Business Gifts, Entertainment, Tickets, and Courtesies

No Bribes, Cash Gifts, Non cash Gifts or Gift Cards/Certificates. We prohibit offering or accepting any form of bribe, kickback, incentive. A bribe is money or something of value given to unfairly influence behavior. A kickback is a rebate, or subsequent payment to someone who influenced a decision or action.

Government Employees and Public Officials

Gifts. Employees and Board members may not directly or indirectly offer or give any cash, gift, gratuity, favor, or anything of value (including building materials) to any federal, state, or local government employee or public official for the benefit of NVolve without the prior approval. No bribes or kickbacks may be offered or accepted. However, food and refreshments of moderate value may occasionally be given to government employees or public officials if permitted by local law or policy.

Political Contributions. We are committed to complying with all laws that regulate the making and reporting of political campaign contributions. Political contributions made on our behalf, in our name (whether directly or by implication), or with our funds or other property may not be made. Employees and Board members are free to make personal political contributions and engage in personal political activities outside of regular business hours with personal Material, non-public information is any information that:

1. Is not generally known by or available to the public.
2. Would likely be considered important by a reasonable investor in making an investment decision.

Obligation to Report Misconduct

Employees or Board members must promptly report to their immediate supervisor any instance where a government employee or public official obtains or attempts to obtain money, goods, favors, or other property or gratuity from us for any purpose by the wrongful use of his or her official position.

Lobbying. Employees and Board members may not lobby federal, state, or local government employees or public officials on our behalf or in our name without specific prior authorization. Employees may discuss a particular NVolve project without prior authorization from NVolve if it is in compliance with the lobbying law of the jurisdiction in which your project is located.

Foreign "Facilitating" Payments

In certain foreign countries, it may be customary for businesses to make small payments to minor or clerical government officials to obtain their prompt performance of routine duties. These payments are generally illegal under the Foreign Corrupt Practices Act and other U.S. laws. Therefore, they are prohibited by the Policy.

Duty to Protect Confidential Information

All Confidential Information must be kept in strict confidence to preserve its confidential or proprietary nature. This obligation includes following all policies and procedures for the use and protection of our internal information systems. Do not disclose Confidential Information without the prior approval.

No Unauthorized Use or Disclosure of Customer Information. Our customers' personal information must be kept confidential and protected from unauthorized use or disclosure.

Protection of NVolve Property. Our property and assets should be used only for legitimate business purposes and according to our internal policies. Do not use our property or assets for purposes unrelated to our business without permission. This includes our intellectual property, such as our logo, trademarks, service marks, and copyrighted items. These assets can be used only in our business.

Protection of Others' Confidential Information. It is our policy to observe the property rights of third parties (including our competitors) and to maintain the privacy of their confidential or proprietary information if it comes into our possession.

Laws Governing Competition

We are committed to competing fully and fairly and in compliance with antitrust laws and other laws governing competition. These laws are complex. Generally, they prohibit agreements with competitors on such matters as price and terms of sale and the allocation of markets or customers.

Drug and Alcohol Free Workplace

Our employees and partners may not perform business activities under the influence of any substance that could impair judgment or work performance. Illegal drugs, alcohol, or any substance that could impair judgment or work performance, may not be consumed in any manner on our premises or worksites at any time. This policy is not intended to limit:

1. Properly used medications prescribed by a licensed medical professional, or obtained over the counter, that do not adversely affect one's performance.
2. Alcoholic beverages that may be allowed on our premises as part of a function authorized in advance.

Health and Safety; Environment

We are committed to maintaining a safe and healthy work environment and complying with all health and safety laws and regulations that apply to our business, including OSHA regulations. NVolve prohibits the possession or use of weapons, firearms, or explosives (whether real, replica, imitation or toy) on Company property. A license to carry the weapon does not supersede Company policy.

NVolve prohibits workplace violence of any kind by our employees, board members, or service providers. Such behavior includes, but is not limited to, threats through oral, written, or email/text messages and gestures or expressions that communicate a direct or indirect threat of physical or mental harm, throwing objects, pushing, shoving, tripping, or grabbing, or any form of indecent or inappropriate physical contact or threatened contact. Anyone who believes he or she has been subjected to such workplace violence should promptly report the facts of the incident or incidents and the names of the individuals involved.

Public Communications

Employees and Board members must comply with our Electronic Communication Systems Policy and Social Media Policy. Our advertising, sales materials, disclosures to home buyers, press releases, and other public communications may not contain any false or misleading statements.

Fair Dealing

We expect employees and Board members to always deal in a straightforward manner with our customers, investors, business partners, service providers, competitors, the public, and one another.