

SITETRACKER

Code of Business Conduct and Ethics

In pursuing our mission, we strive to achieve the highest business and personal ethical standards as well as compliance with the laws and regulations that apply to our business. This Sitetracker Code summarizes the business practices and regulatory requirements that guide our decision-making and business activities. We, as employees, officers, directors, volunteers and all other company agents and representatives, are expected to act in conformity with the principles expressed in this Sitetracker Code of Business Conduct and Ethics (the “Sitetracker Code”). In addition, in acting as leaders, we are responsible for helping our fellow employees understand and comply with the Sitetracker Code.

This Sitetracker Code is an overview of Sitetracker’s principles of business conduct and ethics; it is intended to set standards of conduct and is not a restatement of all of Sitetracker’s policies and procedures. This Sitetracker Code cannot and is not intended to cover every applicable law or provide answers to all questions that might arise; for that we must ultimately rely on each person’s good sense of what is right, including a sense of when it is proper to seek guidance from others on the appropriate course of conduct.

If you have any questions regarding this Sitetracker Code or its application to you in any situation, you should contact your Manager.

Our Workplace

We only use voluntary labor. We do not use forced or involuntary labor of any type (e.g. forced, bonded, indentured or involuntary prison labor), or any form of human trafficking. This includes transporting, harboring, recruiting, transferring or receiving any person by means of threat, force, coercion, abduction or fraud for the purpose of exploitation. All employees, including interns, are free to leave work at any time or terminate their employment without reprisal. Employees are not required to surrender any government issued identification, passports, or work permits as a condition of employment. There are no unreasonable restrictions on employees’ freedom of movement in our workplace in addition to unreasonable restrictions on entering or exiting company -provided facilities.

We do not use child labor. “Child” is any person employed under the minimum age for employment in the relevant country. We support the use of legitimate workplace apprenticeship programs which comply with all the laws and regulations applicable to such apprenticeship programs. Employees under the age of 18 do not perform work that is likely to jeopardize their health, safety or well-being.

Sitracker believes every human life has equal value and should be treated with dignity and respect. We strive to uphold the basic human rights of every individual across all business transactions. We treat all our employees, contractors, consultants, agents, volunteers, and representatives with dignity and respect and do not use corporal punishment, threats of violence or other forms of physical or psychological coercion, harassment, abuse or intimidation.

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Compliance with Laws, Rules and Regulations

Acting ethically and obeying the law, both in letter and in spirit, is a core value of Sitetracker and the basis for this Sitetracker Code. Our success depends upon each person operating within ethical and legal guidelines. We expect employees to understand the legal and regulatory requirements applicable to their area of responsibility, including federal, state and foreign laws. It is also the obligation of each and every director, officer and employee of Sitetracker to become familiar with the goals and policies of the company and integrate them into every aspect of our business. You are expected to use good judgment and common sense in seeking to comply with all applicable laws, rules and regulations and to ask for advice when you are uncertain about them.

Sitracker regards violation of the law, company policies or this Sitetracker Code as a serious matter since violations may put the company and employees at risk. Any violation may subject you to disciplinary action and possible dismissal. Those who work with us, such as contractors, consultants, agents, volunteers, representatives and suppliers, are also required to follow these standards. Certain violations may be referred to legal authorities for investigation and civil or criminal prosecution. If you become aware of the violation of any law, rule or regulation by Sitetracker, whether by its officers, employees or directors, or any third party doing business on behalf of Sitetracker, it is your responsibility to promptly report the matter to your Manager or to Sitetracker's Executive Team. While it is Sitetracker's desire to address matters internally, nothing in this Sitetracker Code should discourage you from reporting any illegal activity, including any violation of the securities laws, antitrust laws or any other federal, state or foreign law, rule or regulation, to the appropriate regulatory authority. This Sitetracker Code should not be construed to prohibit you from testifying, participating or otherwise assisting in any state or federal administrative, judicial or legislative proceeding or investigation.

Trade Practices and Antitrust Compliance

Sitracker supports vigorous, open and fair competition. When representing Sitetracker in the community, you are expected to compete energetically by promoting Sitetracker on the merits, not by disparaging competitors. Product or service comparisons should be fair and accurate. Outside the U.S. there are further constraints under comparative advertising regulations.

Sitracker is subject to laws which regulate the free enterprise system by removing artificial restraints on competition or restraints on the free movement of goods and services. These laws, known as antitrust or trade practice laws, deal with agreements and practices which prevent free and fair trade, such as price fixing, discriminatory pricing, and certain tie-in sales.

Competitive information must be gathered with care. We must conduct all interactions with competitors, including social activities, as if they were completely in the public view, because they may later be subject to examination and unfavorable interpretation. Indeed, discussions of certain topics (such as prices) with

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competitors may be illegal. Any activity in violation of these laws is prohibited. If there is any doubt about the

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legality of a situation, please contact Sitetracker's Executive Team.

All Sitetracker purchases should be made strictly on the basis of quality, suitability, service, price and efficiency. As discussed below, any actual conflict of interest in making a purchase on behalf of Sitetracker is prohibited. You should also be careful to avoid any perceived conflict of interest as that would impact your reputation and Sitetracker's image. We should treat our suppliers fairly and equitably. It is Sitetracker policy to award orders and contracts on the basis of merit and without favoritism.

Worldwide Operations

Sitracker's business operations must comply with the laws and practices which exist in many different locations. Certain U.S. laws also regulate Sitetracker's business conduct outside the United States. The major U. S. laws which are applicable to Sitetracker's overseas business are the Foreign Corrupt Practices Act ("FCPA") and the Export Administration Act ("EAA"). The FCPA generally prohibits payments to government officials in order to influence their decision to assist Sitetracker. Federal controls under the EAA regulate exports of products and technical data from the U.S. and the re-export of these items from one foreign destination to another. If you have any questions regarding this area, please contact Sitetracker's Executive Team.

Honest and Ethical Conduct and Fair Dealing

Employees, officers and directors should endeavor to deal honestly, ethically and fairly with Sitetracker's suppliers, customers, competitors and employees. Statements regarding Sitetracker's products and services must not be untrue, misleading, deceptive or fraudulent. You must not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair-dealing or practice.

Conflicts of Interest

Employees, officers and directors must act in the best interests of Sitetracker. You must refrain from engaging in any activity or having a personal interest that presents a "conflict of interest." A conflict of interest occurs when your personal interest interferes, or appears to interfere, with the interests of Sitetracker, including when an employee, officer, or director, or a member of his or her family, receives improper personal benefits as a result of his or her position in the company. A conflict of interest can also arise whenever you take action or have an interest that prevents you from performing your Sitetracker duties and responsibilities honestly, objectively and effectively. Specific situations that could be considered conflicts of interest include:

- Accepting gifts and services from suppliers or contractors;
- Employment by or ownership of a business (other than minimal stock ownership for investment purposes), that competes with Sitetracker;

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- Use of company assets for personal purposes;

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- Selection of suppliers and persons seeking to do business with the company based on any considerations other than the best interests of the company.

Additionally, certain situations may not be in the best interest of Sitetracker when it appears to persons outside the company that a conflict exists. In these situations, you should apply the principles of this Sitetracker Code in deciding how to correct the situation with the goal of promoting Sitetracker's best interest.

It is your responsibility to disclose any material transaction or relationship that reasonably could be expected to give rise to a conflict of interest to the CEO or Executive Team or, if you are an executive officer to the Board of Directors, who shall be responsible for determining whether such transaction or relationship constitutes a conflict of interest. If you are unsure about whether conduct may be in violation of this policy, please contact your manager or the Executive Team.

Gifts and Gratuities

The use of Sitetracker funds or assets for gifts, gratuities or other favors to government employees or officials is prohibited, except to the extent such gifts are in compliance with applicable law, nominal in amount, and not given in consideration or expectation of any action by the recipient.

Employees, officers and directors must not accept, or permit any member of his or her immediate family to accept, any gifts, gratuities or other favors from any customer, supplier or other person doing or seeking to do business with Sitetracker, other than items of nominal value, generally less than US\$100.00. Any gifts that are not of nominal value should be returned immediately and reported to your Manager. If immediate return is not practical, they should be given to Sitetracker for charitable disposition or such other disposition as Sitetracker believes appropriate in its sole discretion.

Common sense and moderation should prevail in business entertainment engaged in on behalf of Sitetracker. Employees, officers and directors should provide, or accept, business entertainment to or from anyone doing business with Sitetracker only if the entertainment is infrequent, modest and intended to serve legitimate business goals.

Bribes and kickbacks are criminal acts, strictly prohibited by law. You must not offer, give, solicit or receive any form of bribe or kickback anywhere in the world. Each employee must comply with the Sitetracker Anti-Corruption and Bribery Policy.

Protection and Proper Use of Corporate Assets

We all have a duty to protect Sitetracker's assets. Theft, carelessness and waste have a direct impact on Sitetracker's financial performance. Employees, officers and directors must use Sitetracker's assets and

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services solely for legitimate business purposes of Sitetracker and not for any personal benefit or the personal benefit of

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anyone else.

Employees, officers and directors must advance Sitetracker's legitimate interests when the opportunity to do so arises. You must not take for yourself personal opportunities that are discovered through your position with Sitetracker or the use of property or information of Sitetracker.

Confidentiality

Employees, officers and directors must maintain the confidentiality of confidential information entrusted to them by Sitetracker or other companies, including our suppliers and customers, except when disclosure is authorized by a Manager or legally mandated. Unauthorized disclosure of any confidential information is prohibited. Additionally, employees and contractors must take appropriate precautions to ensure that confidential or sensitive business information, whether it is proprietary to Sitetracker or another party for whom Sitetracker has agreed to maintain confidentiality, such as a customer, is communicated within Sitetracker only to those employees who have a need to know such information to perform their responsibilities for Sitetracker. All Sitetracker emails, voicemails and other communications are presumed confidential to Sitetracker and should not be forwarded or otherwise disseminated to individuals outside of Sitetracker, except where required for Sitetracker-related business reasons. Similarly, all customer and supplier information is confidential information and might also include personally identifiable information which you are legally required to protect and keep confidential.

You also must abide by any lawful obligations that you have to your former employer. These obligations may include restrictions on the use and disclosure of confidential information, restrictions on the solicitation of former colleagues to work at Sitetracker and non-competition obligations.

Your obligation to treat certain information as confidential does not end when you leave Sitetracker. You may not disclose any confidential information to a new employer or to others after ceasing to be a Sitetracker employee, director or consultant.

All employees are required to sign an Employee's Proprietary Information and Inventions Agreement with Sitetracker which provides additional detail on your confidentiality obligations that are not contained in this Sitetracker Code.

Use of Company Technical Resources

It is extremely important that you take all necessary measures to ensure the security of your computer and any computer or voicemail passwords. You must use caution when sending sensitive or confidential information in any messages that are widely distributed or sent outside Sitetracker. If you have any reason to believe that your password, credentials or the security of a Sitetracker technological resource has been compromised, then you must contact your Manager and follow the documented incident response procedures.

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Whenever you use a Sitetracker computer or communications resource to send e-mail, voicemail or to access

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Internet services, remember that you are acting as a representative of Sitetracker. Your use of Sitetracker resources could reflect poorly on Sitetracker, damage our reputation, and expose you personally and Sitetracker to legal liability. In addition, all e-mail, Slack messages, voicemail and files stored on Sitetracker computers are Sitetracker's property. You should therefore have no expectation of privacy in connection with these resources.

The use of technological resources must be consistent with all other Sitetracker policies, including those relating to sexual harassment, privacy, patents, copyrights and trademarks. You are prohibited from using Sitetracker's technological resources to transmit, display, store, publish or purposely receive pornographic, obscene or sexually explicit material.

Respect for People and Nondiscrimination

You are critical to the success of Sitetracker, and our policy is to treat you with fairness and respect. Sitetracker is an equal opportunity employer. We do not tolerate discrimination against applicants or employees based on race, color, religious creed, national origin, gender, sexual orientation, age, disability, veteran status, marital status, or any other classification protected by applicable law. We prohibit discrimination based on these protected categories in decisions concerning recruitment, hiring, compensation, benefits, training, termination, promotions, or any other condition of employment or career development. We are committed to providing a work environment that is free from discrimination and/or harassment of any type. We will not tolerate the use of discriminatory slurs; unwelcome, unsolicited sexual advances or harassment; or any other remarks, jokes or conduct that create or foster an offensive or hostile work environment. Each person, at every level of the organization, must act with respect and civility toward customers, coworkers and outside firms.

Please see Sitetracker's Sexual and Other Unlawful Harassment Policy for further detail.

Corporate Communications

Due to the importance of effective and accurate communications by Sitetracker with the financial community and the general public only those individuals designated by Sitetracker are authorized to communicate with industry research analysts and the news media and to issue written public statements (most often as press releases) about Sitetracker.

Sitracker's CEO is responsible for interactions with investors and financial analysts. Refer all inquiries to the Executive Team, who will answer or route them to the appropriate Sitetracker spokesperson.

Waivers of this Sitetracker Code of Business Conduct and Ethics

While some of the policies contained in this Sitetracker Code must be strictly adhered to and no exceptions

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can be allowed, in other cases exceptions may be possible. Any employee or officer who believes that an exception to any of these policies is appropriate should first contact his or her immediate Manager. If the Manager agrees that an exception is appropriate, the approval of the Sitetracker Chief Executive Office for material exceptions must be obtained. The

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Executive Team shall be responsible for maintaining a complete record of all requests for exceptions to any of these policies and the disposition of such requests.

Any executive officer or director who seeks an exception to any of these policies should contact the CEO. Any waiver of this Sitetracker Code for executive officers or directors or any change to this Sitetracker Code that applies to executive officers or directors may be made only by the Board of Directors and will be disclosed as required by law.

Reporting and Compliance Procedures

Every employee, officer and director has the responsibility to ask questions, seek guidance, report suspected violations and express concerns regarding compliance with this Sitetracker Code. Any employee, officer or director who knows or suspects that any other employee or representative of Sitetracker has engaged or is engaging in Company-related conduct that violates applicable law or this Sitetracker Code should report such information to his or her Manager or to Sitetracker Legal, as described below.

You may report such conduct openly or anonymously without fear of retaliation. Sitetracker will not discipline, discriminate against or retaliate against any employee who reports such conduct in good faith. Any Manager who receives a report of a violation of this Sitetracker Code must immediately inform the Sitetracker Legal or the Executive Team.

You may report any violation of this Sitetracker Code by contacting Sitetracker's Legal or Executive Team. We strongly encourage you to identify yourself when reporting a violation of the Sitetracker Code so that we can follow up and be sure to get all the facts and information necessary to make our evaluation of your report as effective as possible. We recognize that some people may feel the need to report a suspected violation anonymously and in that case Sitetracker will use reasonable efforts to protect your confidentiality subject to applicable Law or any applicable legal proceedings. If you do report a suspected violation anonymously, please give us as much detail as you can so that we can better evaluate the information you provide and investigate further as appropriate. You can report an anonymous complaint through the [Lighthouse Platform](#).

If Legal receives information regarding an alleged violation of this Sitetracker Code, he or she shall, as appropriate, (a) evaluate such information, (b) if the alleged violation involves an executive officer or a director, inform the CEO and, if warranted, the Board of Directors of the alleged violation, (c) determine whether it is necessary to conduct an informal inquiry or a formal investigation and, if so, initiate such inquiry or investigation and (d) report the results of any such inquiry or investigation, together with a recommendation as to disposition of the matter, to the CEO for action, or if the alleged violation involves an executive officer or a director, report the results of any such inquiry or investigation to the Board of Directors. Employees, officers and directors are expected to cooperate fully with any inquiry or investigation by

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Sitetracker regarding an alleged violation of this Sitetracker Code. Failure to cooperate with any such inquiry or investigation may result in disciplinary action, up to and including discharge.

It shall be determined whether violations of this Sitetracker Code have occurred and, if so, shall determine the disciplinary measures to be taken against any employee who has violated this Sitetracker Code. In the event that the alleged violation involves an executive officer or a director, the CEO and the Board of Directors, respectively, shall determine whether a violation of this Sitetracker Code has occurred and, if so, shall determine the disciplinary measures to be taken against such executive officer or director.

Failure to comply with the standards outlined in this Sitetracker Code will result in disciplinary action including, but not limited to, reprimands, warnings, probation or suspension without pay, demotions, reductions in salary, discharge and restitution. Certain violations of this Sitetracker Code may require Sitetracker to refer the matter to the appropriate governmental or regulatory authorities for investigation or prosecution. Moreover, any Manager who directs or approves of any conduct in violation of this Sitetracker Code, or who has knowledge of such conduct and does not immediately report it, also will be subject to disciplinary action, up to and including discharge.

Dissemination and Amendment

Sitetracker reserves the right to amend, alter or terminate this Sitetracker Code at any time for any reason. The most current version of this Sitetracker Code can be found on Sitetracker's employee website.

This document is not an employment contract between Sitetracker and any of its employees, officers or directors and does not alter Sitetracker's at-will employment policy.