

CODE OF CONDUCT AND ETHICS POLICY

Polar Dynamics Robotics, Inc.

Effective Date: January 1, 2024

Document Version: 2.0

1. INTRODUCTION AND PURPOSE

1. This Code of Conduct and Ethics Policy (the "Code") establishes the fundamental principles and standards of business conduct for Polar Dynamics Robotics, Inc. (the "Company") and applies to all employees, officers, directors, contractors, and representatives (collectively, "Personnel").

2. The Company's commitment to ethical conduct and compliance is particularly critical given our role in developing autonomous systems for mission-critical environments and our responsibility to maintain the highest standards of safety and reliability.

2. CORE VALUES AND PRINCIPLES

1. Safety First

- Prioritize the safety and reliability of our robotics systems
- Never compromise safety standards for commercial gain
- Maintain rigorous testing protocols for all autonomous systems

2. Innovation with Integrity

- Protect proprietary technology and intellectual property
- Conduct research and development ethically
- Maintain transparency in system capabilities and limitations

3. Customer Trust

- Deliver accurate information about product capabilities
- Maintain confidentiality of customer operations
- Provide honest and reliable support services

3. COMPLIANCE WITH LAWS AND REGULATIONS

1. Regulatory Compliance

- Adhere to all applicable robotics and autonomous systems regulations
- Maintain required certifications and safety standards
- Comply with export control regulations for robotics technology

2. Fair Competition

- Engage in fair and ethical competitive practices
- Avoid anti-competitive behavior or agreements
- Protect and respect intellectual property rights

4. WORKPLACE CONDUCT

1. Safe Working Environment

- Follow all laboratory and testing facility safety protocols
- Report safety concerns immediately
- Maintain proper documentation of safety procedures

2. Discrimination and Harassment

- Zero tolerance for discrimination or harassment
- Promote inclusive work environment
- Equal opportunity in hiring and advancement

3. Confidentiality

- Protect proprietary cold-resistant actuator technology
- Safeguard IceNav AI platform documentation
- Maintain customer deployment information security

5. CONFLICTS OF INTEREST

1. Personnel must avoid situations where personal interests conflict with Company interests, including:

- Outside employment in robotics or automation
- Financial interests in competitors or customers
- Business relationships with family members

2. Disclosure Requirements

- Report potential conflicts to Compliance Officer
- Annual disclosure of relevant financial interests
- Update disclosures as circumstances change

6. RESPONSIBLE TECHNOLOGY DEVELOPMENT

1. Ethical AI Development

- Ensure transparent AI decision-making processes
- Regular bias testing in navigation algorithms
- Maintain human oversight of autonomous systems

2. Environmental Responsibility

- Minimize environmental impact of operations
- Sustainable manufacturing practices
- Proper disposal of electronic components

7. REPORTING AND ENFORCEMENT

1. Reporting Violations

- Confidential reporting hotline: 1-800-POLAR-ETHICS
- Online reporting portal: ethics.polardynamics.com
- Protection against retaliation for good faith reports

2. Investigation Process

- Prompt investigation of reported violations
- Confidential handling of all reports
- Regular updates to relevant stakeholders

3. Disciplinary Actions

- Progressive discipline system
- Potential termination for serious violations
- Reporting to authorities when required

8. POLICY ADMINISTRATION

1. The Chief Compliance Officer shall:

- Maintain and update this Code
- Provide regular training on Code requirements
- Monitor compliance and enforcement

2. Annual Review

- Annual review of Code effectiveness
- Updates based on regulatory changes
- Board approval of material changes

9. ACKNOWLEDGMENT

I acknowledge that I have received, read, and understand the Code of Conduct and Ethics Policy of Polar Dynamics Robotics, Inc. I agree to comply with its provisions.

Name: _

Title: _

Date: _

Signature: _

10. REVISION HISTORY

Version 2.0 - January 1, 2024

Version 1.1 - March 15, 2022

Version 1.0 - June 1, 2020

This Code of Conduct and Ethics Policy supersedes all previous versions and remains in effect until revised or rescinded by authorized Company personnel.