PDF / SOLUTIONS®

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CODE OF ETHICS

PDF Solutions, Inc. and its worldwide subsidiaries (as used herein, "we" or "PDF" or "the Company") are focused on maintaining high standards of ethical conduct. This Code of Ethics (the "Code") reflects the business practices and principles of behavior that support this goal. We expect every employee, officer and director to read and understand this Code and its application to the performance of their Company responsibilities. These standards exist because we believe they are key to:

- delivering value to a global customer base,
- providing solid returns to our stockholders,
- making PDF Solutions a great place to work and build a career, and
- respecting the legal and regulatory environments where we do business around the world.

The Nominating and Corporate Governance Committee is responsible for setting the standards of conduct contained in this Code and for updating these standards as appropriate to reflect legal and regulatory developments and as approved by the Board of Directors. The Company shall from time to time designate a Compliance Officer to administer this Code and address compliance questions. Any violators of this Code may be subject to disciplinary action, consistent with applicable law. Reports regarding actual or suspected violations of this Code should be reported according to Section 21 below.

This Code may be amended or modified from time to time by the Board of Directors subject to the disclosure and other provisions of the Securities Exchange Act of 1934, and the rules thereunder, and the applicable rules of The Nasdaq Stock Market. Any waiver of the provisions of this Code for executive officers or directors of the Company may only be made by the Board of Directors or a committee of the Board of Directors and must be disclosed to stockholders, along with the reasons for any such waiver, as required by the Securities Exchange Act of 1934, and the rules thereunder, and the applicable rules of The Nasdaq Stock Market, including by filing a Current Report on Form 8-K, distributing a press release, or posting the disclosure on the Company's website within the prescribed time period.

Parts of this Code

1. Compliance with Applicable Laws 2
2. Record Keeping and Public Reporting 2
3. Insider Trading 2
4. Antitrust / Competition 3
5. Fair Dealing 3
6. Conflicts of Interest 3
7. Corporate Opportunity 3
8. Protection and Proper Use of Company Assets 4
9. Confidentiality 4
10. Artificial Intelligence and Emerging Technologies 4
11. Cybersecurity and Data Protection 4
12. Media / Public Disclosures 5
13. Foreign Corrupt Practices Act (FCPA) / Government Bribery 5
14. Gifts and Entertainment / Commercial Bribery 5
15. Political Donations and Activities 6
16. Embargoes / Export Control 6
17. Anti-Boycott 7
18. Third-Party Compliance 7
19. Anti-Discrimination / Anti-Harassment / Mutual Respect 7
20. Health, Safety, and Environment 8
21. Reporting Concerns / "Whistleblower" Hotline 8
22. No Retaliation 9
23. Training and Certification 9

1. Compliance with Applicable Laws

It is the Company's policy to, and all employees, officers and directors of the Company must, comply with all applicable laws, rules and regulations. This Code does not attempt to summarize all laws, rules and regulations applicable to the Company, its employees, or its business. You should consult the various guidelines the Company has prepared on specific laws, rules and regulations. Please consult with your local supervisor, the Compliance Officer or a member of the Company's legal department if you have questions about laws that you think may be applicable to the Company, its employees, or its business.

2. Record Keeping and Public Reporting

As a public company, it is of critical importance that the Company's filings with the U.S. Securities and Exchange Commission (the "SEC") be full, fair, accurate, timely and understandable. Depending on their respective positions with the Company, employees, officers or directors may be called upon to provide information necessary to assure that the Company's public reports meet these requirements.

All of our books, records, accounts and financial statements must be maintained in reasonable detail, must appropriately reflect our transactions and must conform both to applicable legal requirements and to our system of internal controls. By way of example, unrecorded or "off the books" funds or assets should not be maintained, only the true and actual number of hours should be reported, and business expense accounts must be documented and recorded accurately. If you are unsure whether a certain time entry or expense is legitimate, ask your supervisor, the Compliance Officer, or a member of the Company's legal department.

The Company expects employees, officers and directors to take this responsibility very seriously and to provide prompt and accurate answers to inquiries related to the Company's public disclosure requirements. We require cooperation and open communication with our internal finance and management team members, legal counsel and external auditors. It is illegal to take any action to fraudulently influence, coerce, manipulate or mislead any auditor engaged in the performance of an audit of our financial statements.

Inappropriate access or modifications to, or unauthorized destruction of, accounting or other business records is prohibited. These prohibitions apply to all business records and data, regardless of whether such data and records are in written form or electronically stored.

If you are requested to provide, review or certify information in connection with our disclosure controls and procedures, you must provide the requested information or otherwise respond in a full, accurate and timely manner. The Company's Document Retention Policy and Record Control Policy govern the retention, management, and destruction of Company records.

3. Insider Trading

Employees, directors, and officers who have access to material, non-public information about the Company or its customers or suppliers are prohibited from trading in the Company's or any customers' or suppliers' securities on the basis of that information, or disclosing it to others who might trade on it (including "tipping"), as set forth in the Company's Insider Trading and Disclosure Policy. Material information is any information that could influence a reasonable person's decision to buy, sell or hold a security, as further described in the Insider Trading and Disclosure Policy. Non-public (or "inside") information is information that has not been released to the public, as further described in the Insider Trading and Disclosure Policy. Examples of material information include financial results and projections (especially to the extent the Company's own expectations regarding its future financial results differ from analysts' expectations), news of a significant merger or acquisition, or changes in executive management.

A securities transaction that may not be made directly by an employee, officer, or director may also not be made indirectly through any other person, including a family member, an agent, a broker, a trade association, a consultant, or other third party.

The Company has established an Insider Trading and Disclosure Policy to address these issues, which is separate from this Code. This summary should be read in conjunction with the full Insider Trading and Disclosure Policy.

4. Antitrust / Competition

Many nations and the European Union have enacted competition laws that are similar to U.S. antitrust laws and prohibit certain anticompetitive activity such as price fixing, bid rigging, and allocation of markets or customers.

The purpose of the antitrust and trade practice laws is to preserve a competitive economy in which free enterprise can flourish. PDF Solutions is aligned with this principle and full compliance with these laws in each jurisdiction within which it operates. Indeed, it has thrived as a vigorous competitor. This section is not intended to serve as a complete and definitive statement of all aspects of the antitrust or trade practice laws or to lay down "bright line" (i.e. definitive) rules. Rather, it is intended to acquaint you with those areas involving antitrust risk so that you will be alert and better positioned to obtain legal advice on a "before the fact" basis. Antitrust laws are complex, and no summary can address every issue or situation that might arise. Violation of these laws may result in severe penalties, including criminal penalties for PDF or any individual involved in the violation. You should consult a member of the Company's legal department whenever a question arises concerning antitrust laws or the subjects discussed below.

5. Fair Dealing

Each employee, officer and director must deal fairly with the Company's customers, suppliers, competitors, officers and employees. No, employee, officer, or director is permitted to take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair dealing practice. Stealing or misusing proprietary information, misusing trade secret information that was obtained without the owner's consent, or inducing such disclosures by past or present employees of other companies is prohibited, consistent with each employee's Confidential Information and Invention Assignment Agreement.

6. Conflicts of Interest

A "conflict of interest" may exist whenever the private interests of an employee, officer or director conflict in any way (or even appear to conflict) with the interests of the Company. While our employees, officers and directors should be free to make personal investments and enjoy social relations and normal business courtesies, they must not have any personal interests that adversely influence the performance of their job responsibilities. A conflict situation can arise when an employee, officer or director takes actions or has interests that may make it difficult to perform their Company work objectively. Conflicts of interest may also arise when an employee, officer or director, receives improper personal benefits as a result of his or her position in the Company, whether received from the Company or a third party. You may not circumvent these prohibitions by using a third party, family member or intermediary to do what would be or appear to be a conflict of interest if done directly.

It is the Company's policy not to guarantee the obligations of, employees, officers and directors as it may create conflicts of interest. In addition, U.S. and foreign laws prohibit personal loans from the Company to directors and officers.

In general, as provided in each employee's Confidential Information and Invention Assignment Agreement, employees and officers may not work simultaneously for a competitor, customer, or supplier absent an express written consent or waiver from the Company. Such agreement similarly requires the Company's prior written consent for outside employment or activities detrimental to the Company's interests. Conflicts of interest may not always be clear-cut, so if you have a question, you should consult with a supervisor, the Compliance Officer or a member of the Company's legal department.

7. Corporate Opportunity

Except as may be approved or ratified by the Board of Directors or a committee of independent directors, employees, officers, and directors are prohibited from (a) taking for themselves personally any opportunities that belong to the

Company or are discovered through the use of corporate property, information or position; (b) using corporate property, information or position for personal gain; and (c) competing with the Company. Ownership of inventions, designs, and other intellectual property developed using Company resources, time, or information is governed by each employee's Confidential Information and Invention Assignment Agreement.

8. Protection and Proper Use of Company Assets

All employees, officers and directors should protect the Company's assets and ensure their efficient use. Theft, carelessness, and waste have a direct impact on the Company's profitability. All Company assets should be used only for legitimate business purposes.

Company work facilities, property and supplies, including its computer systems and the files maintained and used by such electronic systems (e.g., e-mail system, voicemail, software, and computer files) regardless of password protection, telephones, photocopying facilities, mailroom, stationery, trademarks, and logos, all are Company property and are provided to you for the performance of your duties for PDF Solutions. You must immediately return all Company property (including property issued for home use) to us upon request or termination of your employment. We expect you to use the Company's electronic systems for proper business purposes. For example, you should never send an e-mail if you would not put the same words in a letter or memo and you should never use PDF's electronic systems (including computers, e-mail, facsimiles (or other electronic communications)) to view, create or distribute offensive, vulgar, or pornographic images or materials.

The Company has established a PDF Systems Acceptable Use Policy to address these issues, which is separate from this Code. This summary is subject to the full PDF Systems Acceptable Use Policy.

9. Confidentiality

All employees and officers, under the Confidential Information and Invention Assignment Agreement or other applicable confidentiality agreement signed upon joining the Company, and all directors, must maintain the confidentiality of, and may not use for any purpose other than performing their duties for the Company, confidential information entrusted to them by the Company or its suppliers or customers, except when disclosure is authorized by the Company or required by laws, regulations, or legal proceedings. As more fully described in the Confidential Information and Invention Assignment Agreement, or other applicable confidentiality agreement, "confidential information" includes, but is not limited to, nonpublic information, including that which might be of use to competitors of the Company or harmful to the Company or its customers if disclosed. Whenever feasible, employees, officers, and directors should consult a supervisor, the Compliance Officer, or a member of the Company's legal department if they have a question about whether they have a legal obligation to disclose confidential information.

10. Artificial Intelligence and Emerging Technologies

PDF Solutions is committed to the responsible and ethical use of artificial intelligence and other emerging technologies. Use of AI tools in connection with Company business is governed by the Company's Corp AI Systems Acceptable Use Policy, including its requirements on data input restrictions, verification of AI-generated output, and legal compliance. Direct any questions about whether a particular AI tool or use case is approved to the IT or legal department.

11. Cybersecurity and Data Protection

All employees, officers, and directors are responsible for protecting the security of Company information, systems, and the personal data of employees, customers, and other third parties in the Company's care, in accordance with the Company's Corporate Information Security Management System (ISMS) Policy and related information security policies. You must promptly report any suspected or actual security incident in accordance with the Company's Security Incident Reporting Policy (SIRP) and Incident Response Policy. Do not attempt to independently investigate or remediate a suspected incident, as doing so may interfere with the Company's response and legal obligations.

12. Media / Public Disclosures

It is our policy to disclose material information concerning PDF Solutions to the public only through specific limited channels to avoid inappropriate publicity and to ensure that all those with an interest in the Company will have equal access to information. All inquiries or calls from the press and financial analysts should be referred to our Chief Financial Officer. We have designated our Chief Executive and Chief Financial Officers as our official spokespeople for financial matters. We have also designated specific individuals as our official spokespersons for marketing, technical and other related information. Unless a specific exception has been made by the Compliance Officer, these individuals are the only people who may communicate with the press on behalf of the Company. Any use of social media on behalf of, or referencing, the Company is governed by the Company's Corporate Social Media Policy, and any recording of Company meetings is governed by the Company's Corp Meeting Recording Policy.

13. Foreign Corrupt Practices Act (FCPA) / Government Bribery

Employees, officers and directors of all the Company (foreign and domestic) and their respective agents and representatives are prohibited (except as set forth below) from making any payment or offer of payment or furnishing or promising of gifts, other benefits, or anything of value to any (i) foreign official, (ii) political party, (iii) candidate for foreign political office, (iv) officer or employee of a public international organization, or (v) any immediate family member of any of the foregoing persons (collectively, "official") to induce that official to affect any government act or decision or to assist the Company in obtaining or retaining business or any other unfair advantage. For example, a payment to a foreign official to obtain a tax incentive or exemption, or a regulatory change is an improper payment under the U.S. Foreign Corrupt Practices Act ("FCPA") and many other laws, such as the UK Bribery Act of 2010 and is against PDF Solutions' policy. The Company's policy prohibits bribes, payments or gifts to any official. This policy extends to indirect payments made through agents and includes the use of personal funds. The Company's directors, officers, and employees are prohibited from doing through a third-party intermediary that which they are prohibited from doing directly. Some countries operate bribery and corruption laws that are wider in scope than the FCPA, in that they cover bribery or corrupt activity in respect of any person, not simply a government official. The UK has such a law, the Bribery Act 2010. Under this Act, any of the acts detailed above in relation to government officials apply to any person you would meet in the course of business (e.g. a customer, supplier, agent, consultant), as well as government officials. Therefore, if you are (i) a UK citizen; (ii) ordinarily resident in the UK; or, (iii) otherwise providing any services to or on behalf of a UK company, you must not act corruptly towards any person.

The law also requires that the Company's books and records accurately report all payments made by or on behalf of PDF. See also Section 2 of this Code above, Record Keeping and Public Reporting, for additional information.

14. Gifts and Entertainment / Commercial Bribery

To avoid even the appearance of impropriety, except as specifically noted below, it is the Company's policy that employees will not accept or give gifts, favors, entertainment, or anything else of any significant value from or to current or prospective intermediaries, customers, suppliers, or contractors without prior written authorization from our Compliance Officer or his or her designee. All decisions regarding the investing of our assets or the purchasing of goods and services must be made on the basis of applicable investment or acquisition criteria, and in a way that preserves the Company's integrity. Business connected entertainment may be extended to intermediaries, customers, and suppliers (current or prospective), as long as it is legal, proportionate, and reasonable in relation to customary commercial practice and not intended to influence conduct. Some countries have bribery and corruption laws that are broad in scope. For example, the UK Bribery Act 2010 prohibits the giving or receiving of anything of value to expedite routine administrative actions.

Fees, commissions, or other amounts paid to outside contractors, resellers, agents, or other third parties must be fully disclosed to and approved in writing by our Chief Financial Officer or his or her designee, and must be legal, proportionate, and reasonable in relation to customary commercial practice, and not intended to influence conduct. Payments to these persons should never be used to accomplish indirectly what the Company could not properly or legally do directly.

If you have any questions as to the acceptability of any entertainment activity or gift, consult with your local supervisor, the Compliance Officer, or a member of the Company's legal department.

15. Political Donations and Activities

The Company believes that it is important for employees to be able to take an active interest in political affairs. However, political activities must not be conducted during work hours (other than voting) and must not involve the use of Company equipment, supplies, or facilities. Employees should make it clear that their participation in political activities is not done as representatives of PDF Solutions. Employees may not make any political contributions (whether in cash, goods, or services) on behalf of PDF Solutions. If the Company deems it appropriate to take a public position on issues, it will designate specific individuals to speak on its behalf.

16. Embargoes / Export Control

US embargo regulations ban trade entirely with certain countries. In addition, trade and certain activities are restricted in some other countries. There are also several different lists, maintained by different U.S. government offices, of persons and entities with which trade is banned or restricted, including some in countries not included in the preceding list. The prohibitions and restrictions imposed under these regulations affect exports, imports, travel, currency transactions, assets, services and accounts. You should review any proposed activity with respect to any of these countries with the legal department in advance. In addition, since the list of countries and the list of persons and entities subject to these restrictions changes from time to time, you should be sensitive to the possibility that other countries and the list of persons and entities hostile to the United States are subject to trade restrictions. You should consult with the legal department before initiating activity with such countries persons or entities. Generally, all parties to any prospective international business transaction should be "screened" against the various United States Government lists of banned and restricted parties (e.g., the OFAC list of specially designated nationals, the Commerce Department's Denied Parties List, and the Commerce Department's BIS Entity List), and no transaction may be concluded in which any such banned or restricted party is a participant, or has an interest, unless specifically authorized by the legal department.

Further, the Company is subject to U.S.-imposed legal controls on access to, and disclosure of, certain U.S.-origin or U.S.-located technology, including equipment, software, other products, other technology, technical assistance and other technical information, as well as some of our customers' information (collectively "Technical Information"). The Compliance Officer determines from time to time the various export classifications and/or treatments of Technical Information at PDF in relation to applicable export laws and proposed recipients, and makes such determinations and arrangements available to PDF employees, as appropriate. U.S export laws and regulations prohibit access or disclosure of this controlled Technical Information to certain non-U.S. entities or persons, except under specified conditions, which may include an export license. You should be aware that these laws may limit your or other PDF employees' access to, or ability to use, such information. It is PDF Solutions' policy to comply with all applicable export and re-export laws. Accordingly, you may not export, disclose, permit access to, or assist access to Technical Information in violation of applicable laws. All employees shall exercise reasonable care to prevent disclosure or access not authorized under applicable laws. Without limiting the above, a PDF employee shall, before exporting, disclosing, providing, or allowing access to Technical Information to non-U.S. recipients, check on applicable export control arrangements in accordance with any procedures issued by the Compliance Officer.

This section is subject to the Company's corporate policies and work instructions on export control and sanctions compliance, which also address end-use, end-user, and restricted party controls. Such policies include the U.S. Export Control Policy; additional specific policies on separate access materials, regulatory due diligence screening of counterparties, and restrictions on certain U.S. Person activity; and written instructions or determinations issued by the legal department in specific matters. You must provide to the legal department information it requests to assess status of export control or sanctions matters. You must immediately escalate any red flags — such as unusual shipping routes, reluctance to provide end-use information, or requests to circumvent compliance procedures — to the Compliance Officer or legal department before proceeding. The Company does not conduct business with any country, entity, or individual in violation of U.S. or other applicable sanctions, export control, or anti-boycott laws.

17. Anti-Boycott

U.S. anti-boycott laws are designed to prevent businesses from cooperating with unsanctioned foreign boycotts of countries friendly to the United States. In general, the anti-boycott laws and regulations prohibit any cooperation with a foreign boycott, including, for example, by way of (i) refusal to do business with another person; (ii) discriminatory employment practices; (iii) furnishing information on the race, religion, sex or national origin of any U.S. person; (iv) furnishing information concerning any person's affiliations or business relationships with a boycotted country or any person believed to be restricted from doing business in the boycotting countries; or (v) utilizing letters of credit or other documents containing boycott provisions.

18. Third-Party Compliance

PDF Solutions expects its agents, distributors, resellers, consultants, suppliers, and other third parties who act on the Company's behalf (collectively, "Third Parties") to comply with the standards of this Code applicable to their engagement, including applicable anti-corruption, export control and sanctions, antitrust, and data protection laws, as well as applicable industry standards such as the Responsible Business Alliance Code of Conduct. Engagement of vendors and other Third Parties is subject to the Company's Corp Vendor Management Policy, including its due diligence and monitoring requirements, and Third Parties with access to Company data must comply with the Company's Supplier Information Security Policy. If you become aware of any red flag suggesting a Third Party may be engaging in corruption, sanctions violations, or other illegal or unethical conduct on the Company's behalf, you must promptly escalate the concern to the Compliance Officer or legal department.

19. Anti-Discrimination / Anti-Harassment / Mutual Respect

<u>Respect for Everyone</u>

It is the Company's policy to comply with all applicable anti-discrimination and anti- harassment laws. We will not tolerate any unlawful discrimination in employment, recruitment, compensation, termination, promotions, and other conditions of employment against any employee or job applicant, or any harassment based upon an individual's legally protected characteristics. For example in the United States, legally protected characteristics may include gender, race, color, national origin, disability, age, or religion. All employees, including supervisors and other management personnel, are expected and required to abide by this policy. If you have questions as to the acceptability of any conduct, consult with your local supervisor, the Compliance Officer, or a member of the Company's human resources or legal departments. No person's employment with PDF will be adversely affected as a result of bringing complaints of unlawful discrimination or harassment in good faith.

Further, PDF expects employees, officers, and directors to treat other employees, officers, directors, customers, visitors, independent contractors, and providers of services or products to PDF Solutions with respect and consideration. It means we take care to treat others professionally. We work in a global environment with people from many different cultures, religions, and nations. Our employees and customers are a very diverse group. When you are unfamiliar with what might be unlawful in another country or offensive to someone from another culture, take the time to ask. It is the responsibility of each Company employee to be considerate of the different norms, behaviors, and beliefs of colleagues, whether they are customers or other Company employees.

It is not possible to provide a definitive list of prohibited behaviors since the particular circumstances of each event define whether it is good-natured or demeaning and offensive or illegal. Consider the following guidelines if you have questions about what is acceptable conduct:

- Treat everyone with dignity and courtesy.
- Ask yourself if you would say or do the same, considering if a loved one were standing next to you.
- Do not make a comment, tell a joke, send an e-mail, or engage in any behavior unless you know it will not be offensive to co-workers who can observe you.

- Do not assume that your behavior is acceptable because no one has objected to it.

Respect for Customers

PDF Solutions serves many customers. We make our business successful by adding value to our customers' businesses. We have a significant obligation to treat customers with respect. That includes how we discuss their issues, business, and people, as well as how we handle their data and intellectual property. Discussions about customers should be consistently respectful and professional regardless of where we are or who is with us. Make sure, for yourself and with others, that we would not regret customers hearing anything we say about them in our meetings or casual conversation. They make our success possible.

Business records and communications sometimes become public. Accordingly, we should avoid exaggeration, derogatory remarks, guesswork, or inappropriate characterizations of people and companies that may be misunderstood. This applies equally to e-mail, chat (e.g., Teams and SFDC), internal memos, and formal reports.

20. Health, Safety, and Environment

PDF Solutions' policy is to provide a safe and healthy workplace for its employees and guests, to conduct its operations in an environmentally sound, socially responsible manner, and to comply with applicable health, safety, and environmental laws and regulations.

Each of us shares the responsibility for maintaining a safe and healthy workplace by following safety and health rules and practices. Violence and threatening behavior are not permitted. Further, misusing controlled substances or selling, manufacturing, distributing, possessing, using, or being under the influence of illegal drugs on the job is absolutely prohibited.

Management is responsible for providing proper training on the rules and regulations applicable to the workplace, and the tools to do the job safely. Employees engaged in certain activities (such as work in clean room environments or the assembly, handling, or shipping of heavy machinery or equipment) are subject to additional health and safety policies and required training specific to those activities. Employees are responsible for following the rules, using the tools provided to them and supporting management's health, safety, and environmental initiatives.

21. Reporting Concerns / "Whistleblower" Hotline

Often, the choices we face are difficult to make, and the decisions we make can fall into grey areas. In addition, laws and regulations concerning ethical issues are often complex and subject to interpretation. This is why it is important to speak up and to ask questions.

Each employee, officer, and director must promptly report to the Company any circumstances that such person believes in good faith may constitute a violation of this Code or applicable law, regulation, or rule.

Generally, your immediate manager will be in the best position to understand the situation and resolve the issue. Managers at PDF Solutions are expected to maintain an "open door" policy with respect to your questions and concerns and to be diligent in responding to issues raised. The goal is to bring concerns into the open so that any problems can be resolved quickly, preventing any further harm.

Beyond your local manager, PDF Solutions offers you several ways to get answers to your questions about ethics issues and to raise any concerns about possible violations of the Code of Ethics or applicable law. You may contact your local human resources representative, other local manager, or employee delegate or representative, if any. Because the manner in which reports of violations or suspected violations may be made varies from country to country, you may also contact a third party that administers our "whistleblower" hotline – NAVEX (855-208-8579) – for guidance on which matters, to whom and how such matters may be reported. Upon contacting the hotline, you may receive further instructions on how to report particular conduct. If you are calling about a matter that should be handled in accordance

with local legal requirements, the hotline may direct you back to local management. Employees in Europe (and elsewhere) may also make a report through NAVEX or directly to a U.S. Compliance Officer, the U.S. Legal Department, U.S. Human Resources, or the Audit Committee, consistent with applicable local law. Any concern relating to accounting, internal accounting controls or an auditing matter, banking and financial crime or anti-corruption may also be reported directly to PDF Solutions' Compliance Officer, the Audit Committee of the Board of Directors, or any member of the Company's legal department.

Reports may be made anonymously to the extent permitted by applicable law or by identifying yourself. Because it may be more difficult to thoroughly investigate reports that are made anonymously, you are encouraged to share your identity when reporting rather than reporting anonymously. All reports, whether identified or anonymous, will be treated confidentially to the extent feasible and consistent with applicable law.

Nothing in this Code, any other Company policy, or any confidentiality, severance, or other agreement with the Company restricts or prohibits you from reporting possible violations of law or regulation to, or otherwise communicating or cooperating with, any governmental agency or regulatory authority (including the U.S. Securities and Exchange Commission, the Department of Justice, and other U.S. or non-U.S. regulators), including providing documents or information, without prior notice to, or authorization from, the Company. You are not required to obtain the Company's consent prior to making any such report or disclosure, and nothing in this Code limits your eligibility for an award for information provided to a government agency pursuant to any applicable whistleblower-award program.

22. No Retaliation

The Company will not retaliate against anyone who, in good faith and with a reasonable basis, makes a report or complaint, raises a concern, participates in or cooperates with an internal or external investigation or audit, exercises rights under any whistleblower or anti-retaliation law, or otherwise engages in any activity protected under applicable law. Under no circumstances will you be subject to any disciplinary or retaliatory action for engaging in any such protected activity, including reporting in good faith a possible violation of this Code or applicable law, cooperating in any investigation of a possible violation, or communicating directly with any government or regulatory authority. However, knowingly false or malicious reports will not be tolerated, and anyone filing such reports may be subject to appropriate disciplinary action consistent with applicable law.

23. Training and Certification

The Company requires employees, officers, and directors to complete compliance training assigned to them, including training relating to this Code, on a timely basis. You may be required to periodically certify your compliance with this Code and completion of required training. Failure to complete required training or certifications, or providing a false certification, may result in disciplinary action, up to and including termination, consistent with applicable law.