

# Code of Business Ethics and Conduct Policy

## Policy Overview

<b>Policy Overview</b>	Our Code of Business Ethics and Conduct clarifies our values and principles, linking them with standards of professional conduct and articulates the values we wish to foster in our leaders and employees and, in doing so, defines desired behavior. It encourages discussions of ethics and compliance, empowering employees to handle ethical dilemmas they encounter in everyday work.								
<b>Why is this policy needed</b>	Blaize has a responsibility to conduct its business in strict compliance with all applicable laws and regulations, and it is the company's policy to do so								
<b>Document Owner</b>	<table border="1"> <tr> <td><b>Owner</b></td> <td>Human Resource</td> </tr> <tr> <td><b>Authority</b></td> <td>Steering Working Group</td> </tr> <tr> <td><b>Contributors</b></td> <td>Celeste DeSouza</td> </tr> <tr> <td><b>Audience</b></td> <td>All Blaize Employees in USA</td> </tr> </table> <p>Roles Definition</p>	<b>Owner</b>	Human Resource	<b>Authority</b>	Steering Working Group	<b>Contributors</b>	Celeste DeSouza	<b>Audience</b>	All Blaize Employees in USA
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<b>Corresponding Links</b>									

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## Details of the Policy

### Overview

Our Code of Business Ethics and Conduct clarifies our values and principles, linking them with standards of professional conduct and articulates the values we wish to foster in our leaders and employees and, in doing so, defines desired behavior. It encourages discussions of ethics and compliance, empowering employees to handle ethical dilemmas they encounter in everyday work. This Code is not intended to reduce or limit other obligations that leaders and employees may have to Blaize.

### Code of Business Ethics and Conduct

Blaize has a responsibility to conduct its business in strict compliance with all applicable laws, rules, and regulations, and it is the company's policy to do so. Blaize therefore expects employees to act in accordance with the highest standards of business ethics both on and off company premises, to avoid any appearance of impropriety, and to observe all applicable laws and regulations while conducting business on the company's behalf. Employees are expected to abide by the spirit as well as the letter of this Code. This Code must be read in conjunction with the Blaize handbook and other Blaize compliance and employment policies, practices, and procedures. Employees are also expected to cooperate with any inquiries or investigations concerning a possible or suspected violation of this Code unless employee(s) are informed

at the time of the investigation that their participation is voluntary. Any employee's failure to fulfill his or her responsibilities under this Code may result in disciplinary action, up to and including immediate termination of employment.

## **Ethical Standards**

Blaize is committed to conducting business in a fair and open manner within the spirit and letter of the law, with the highest regard for customers, the community, and employees. Blaize success depends not only on the knowledge, skills, and abilities of our employees, but also on their performance of work with sound judgment, self-discipline, common sense, and integrity. No employee shall engage in any unlawful activity in conducting business for Blaize, or in performing day to day duties, nor shall any employee instruct others acting as agents for Blaize to engage in unlawful or unethical activity. As such, all employees are required to maintain and uphold the following common ethical standards, in all aspects of their work:

- To pursue company objectives in all of your work in a manner that does not conflict with the integrity or best interests of the company, or that disrupt or impair the company's relationship with any person or entity with which the company has or proposes to enter into a business or contractual relationship, or that conflicts with the public interest
- To be truthful and accurate in performing job functions
- To protect Confidential Information as defined by the company
- To observe all laws, regulations, ordinances, and rules applicable to the operation of the business
- To maintain honest and fair relationships with all company vendors
- To ensure quality and value in the company's products/services and relationships with customers and vendors
- To avoid, during the course of employment, any situations that may engender any conflict between the personal interests of our employees and the exercise of discretionary decisions on behalf of the company.

## **Conflicts of Interest**

Blaize recognizes and respects the right of its employees to engage in outside activities, provided that these activities do not impair or interfere with the performance of an employee's duties to Blaize or an employee's ability to act in the best interest of Blaize. Blaize insists on the undivided loyalty of all employees, including management and non-management staff, in the performance of all job functions. Therefore, employees must not engage in any conduct and must avoid situations, that would create an actual or potential conflict of interest in performing your job or create the appearance of such a conflict.

Conflicts of interest arise in work situations when an employee's personal activity or personal interest is contrary or appears to be contrary to the interests of the company. These personal activities or interests may influence the employee's judgment, causing the employee to make decisions on behalf of the company based upon the potential for personal gain, rather than in the best interests of the company. For example, a conflict of interest can arise when an employee takes action or has a personal interest that may make it difficult to perform duties for Blaize objectively and effectively. Conflicts of interest can also occur indirectly. For example, a conflict of interest may arise when an employee has a material interest in a company doing business with Blaize.

To prevent conflicts of interest, the following behavior is deemed unacceptable and unethical, except to the extent the law provides otherwise:

- Receiving or giving of merchandise, money, services, travel, accommodations, or lavish entertainment that might appear to have been given to influence a business decision. Gifts and entertainment should further the business interests of Blaize and not be construed as potentially influencing business judgement or creating an obligation. Gifts offered or received at any time in your capacity as an employee or representative of the company

that are of more than minimal or token value of \$50.00 USD or more shall not be accepted and shall be returned to the sender with an appropriate explanatory note or letter.

- Maintaining a personal, business, or financial relationship with a customer or vendor where the employee has control or influence over the company's relationship with that customer or vendor. For example, employees should not borrow from or lend personal funds to a customer or vendor of the employee's division.
- Using information developed or learned on the job for personal or familial benefit or any other use except for in the furtherance of an employee's legitimate employment obligations. This includes the use of company databases, financial information, and intellectual property. All of Blaize's assets, including confidential information, should only be used for legitimate business purposes. The obligation of employees to protect the Company's assets includes its Confidential Information. "Confidential Information" includes, but is not limited to, intellectual property such as trade secrets, patents, trademarks and copyrights, as well as business, marketing and service plans, designs, databases, records, salary information and any unpublished financial data and reports.
- Maintaining outside directorship, employment, or political office that might appear to or actually conflict or compete with an employee's responsibilities.
- Conducting company business with, or using position or authority to influence the company to conduct business with, family members or others that lead to unfair dealing. No employee should take unfair advantage of anyone, including Blaize, through manipulation, concealment, abuse of privileged information, misrepresentation of material fact, or any other unfair dealing practice.
- Unauthorized sharing of Confidential Information or proprietary company-related information with business associates or representatives of other companies.
- All employees are prohibited from directly or indirectly taking personally for themselves opportunities that are discovered through the use of Blaize property, information, or positions. All employees may not use Blaize property, information, or positions for personal gain.

The list above serves only to illustrate sources of possible conflicts of interest and does not constitute a complete list of all the situations that may result in a conflict of interest. Ultimately, it is the responsibility of each employee to avoid any situation that could affect their ability to judge situations independently and objectively on behalf of the company and any situation that could even appear to be a conflict of interest. It is important to note that under certain circumstances, conflicts of interest can amount to violations of criminal law. Any doubts should be resolved in a discussion with your manager, HR Representative, or your company's legal counsel.

### **Employment of Relatives and Significant Others**

A familial or intimate relationship among employees can create an actual, potential or perceived conflict of interest in the employment setting, especially if one relative, spouse, partner or member of such a relationship supervises another relative, spouse, partner or member. To avoid conflicts of interest, favoritism, and to promote stability and goodwill in the workplace, we may refuse to hire or transfer relatives or other intimately associated individual into positions in which they supervise or are supervised by another close family member or significant other. We may refuse to place an individual in positions in which they work with or have access to sensitive information about family members or other intimately associated individual. The same general considerations apply if two employees marry or become involved in a domestic-partner relationship. If a supervisory, security, morale, safety, or other conflict results from the relationship, we reserve the right to use our discretion in hiring and placing employees in a manner designed to avoid these concerns. One of the employees may be transferred— or, if necessary, terminated—to resolve the situation.

The term "relatives," as used in the preceding paragraph, refers to a any person who is related by blood or marriage or whose relationship with the employee is similar to that of persons who are related by blood or marriage (e.g., domestic partnership, adopted children).

This Code also applies to significant others. If a romantic and/or sexual relationship develops between employees, the employees must immediately provide notice to Human Resources. In addition, if a conflict or appearance of a conflict of interest, arises because of a dating relationship, or the relationship causes disruption, creates a negative or unprofessional work environment, may lead to claims of sexual harassment and/or retaliation or presents concerns regarding supervision, safety, security or morale, at our sole discretion, the conflict may be resolved by the transfer of one or both employees or termination of employment.

### Recognizing & Reporting a Conflict

It is essential that all employees pay close attention to possible violations of the Code of Business Ethics and Conduct, whether they occur because of an oversight or intentionally. Any employee who is aware of possible violations should notify his or her manager, a company officer, or Human Resources department. If you are not sure whether there is an ethical problem, it is better to ask.

Here are some signs to watch for:

- An employee feels uncomfortable about a business decision, or about something you've been asked to do at work.
- An employee has witnessed a situation involving a business decision that made you or someone else feel uncomfortable.
- An employee feels that the company would be embarrassed, or face legal implications, if a business conflict were revealed to the public.

### Violation of the Code

Violations of this Code will be grounds for discharge or other disciplinary action, adapted to the circumstances of the particular violation. Disciplinary action will be taken against individuals who authorize or participate directly in a violation of the Code. Disciplinary action also may be taken against any of the violator's managerial superiors, to the extent that the circumstances of the violation reflect inadequate supervision and leadership by the superior.

Compliance with the Code will be considered in the evaluation of each individual's overall performance.

### Prohibition Against Retaliation

If an employee or applicant believes that he or she has been retaliated against for disclosing information regarding misconduct under the Code, he/she should file a written complaint with any company manager, any company officer, or Human Resources. It is company policy to encourage employees to come forward with any safety, ethical, or legal concerns. Retaliation against those who bring forward these types of related concerns or complaints will not be tolerated.

## Page Properties

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