

Revasum, Inc.

Standards of Business Conduct V1.0

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Introduction	4
The Standards Apply to Everyone at Revasum and to our Suppliers	4
Exercise Good Judgment	5
Ask Questions & Report Concerns	5
Non-Retaliation Policy	5
Resources	5
Core Values	5
Positive Work Environment	6
Conflicts of Interest	6
All Potential Conflicts of Interest Must be Disclosed	6
When in Doubt, Seek Guidance	7
Types of Conflicts of Interest	7
Outside Employment, Business Activities and Consulting	7
Outside Boards of Directors, Advisory Boards and Venture Capital Funds	7
Outside Transactions	8
Financial Interests in Other Companies	8
Revasum's Board of Directors	8
Use of Company Assets and Electronic Communications and Data Systems	9
Data Privacy	9
Protection of Company Confidential Information and Intellectual Property	10
Confidential Information and the Internet	11
Contacts with Investors, Analysts or the Media	11
Inventions and Patents	11
Trademarks	12
Recordkeeping and Accounting Practices	12
Unauthorized Side Deals and Side Letters are Prohibited	12
Business Gifts, Meals And Entertainment	13
Additional Requirements for Gifts to Government Officials	13
Anti-Corruption Policy	13
International Business Conduct and Human Rights	14
Workplace Safety	15
Antitrust and Unfair Competition	15
Prohibited Practices regarding Competitors	15
Prohibited Practices regarding Customers	16

Prohibited Practices regarding Suppliers and Resellers	16
Confidential Information and Intellectual Property of Others	17
Copyright	17
Selection and Treatment of Suppliers	18
Insider Trading And Tipping	18
Do Not Engage in Insider Trading	19
Do Not Engage in Tipping	19
Joining an Expert Network is Prohibited	19
"Blackout" Requirements	19
Continuous Disclosure	20
Environment	20
Taxes	20
Import, Export and Anti-Boycott Law	21
Corporate Philanthropy Program	22
Government Contracts	22
Your Obligation to Take Action	23
Participating In Investigations	23
Compliance and Consequences	23
Additional Resources and Contact Information	
NOTE	24

Introduction

Revasum is committed to upholding the highest ethical standards in our workplace and in our business dealings. Our values, including close to the customer, mutual trust and respect, and world class performance, are the cornerstone of Revasum' success. Each of us is responsible for embracing the high standards we set for ourselves and being a role model for our values. Each of us makes decisions every day for Revasum. These decisions – both large and small – define our values and our business, and may have a direct impact on our financial results, our co-workers and business partners, our communities and our reputation. It is critical that we have a shared understanding of and commitment to ethical business conduct, especially given the complexity and variety of issues that can arise. To promote a strong and consistent culture of ethics, Revasum has one set of Standards of Business Conduct that applies to its entire workforce around the globe. These Standards are intended to help guide you in making the best possible decisions. As a member of Revasum's worldwide workforce, it is your personal responsibility to read, understand and comply with these Standards, as well as other Company policies. We believe that good ethical decisions are made when adequate information and resources are readily available. Nothing short of ethical and legal conduct is acceptable. If you are ever in doubt about an action, unclear about Revasum' expectations, or asked to engage in or become aware of conduct that is not consistent with Company values, speak up and seek guidance from the resources available to assist you. Contact your manager, the Human Resources Department, the CEO or the CFO. You may also email the Compliance email at compliance@revasum.com - which will automatically be distributed to the CEO, the CFO, and the independent Audit Committee Chairman. Revasum's reputation for honest and fair business dealings developed and continues today through your dedicated efforts. Revasum is committed to conducting business using the highest ethical standards, and this same commitment is expected from every member of our global workforce.

These Standards of Business Conduct (the "Standards") are a set of guidelines intended to reinforce and uphold the values of Revasum, Inc. and its subsidiaries (collectively, "Revasum" or the "Company"). They define what we expect of each member of our workforce. In this guidebook, you will find policies and resources, as well as questions and answers, to help in your ethical decision-making and conduct. These Standards, which are the foundation of our Global Ethics and Compliance Program, are updated periodically as part of our commitment to continuous improvement in all aspects of our business. It is your personal responsibility to read and understand these Standards, as well as other Company policies; comply with them both in letter and spirit; and seek guidance when appropriate.

The Standards Apply to Everyone at Revasum and to our Suppliers

All members of Revasum' workforce – namely, all persons who work for or provide services to the Company, including directors, officers, employees, contractors, temporary workers and consultants – are expected to understand and comply with these Standards. Where noted, certain provisions apply only to a specific sector of the workforce, such as employees. We also expect our suppliers to comply with these Standards.

Exercise Good Judgment

These Standards identify the legal and ethical rules under which we conduct business around the globe. Because it is not possible to anticipate all situations that may arise, the following questions can help you reach the appropriate decision when faced with a potential ethical issue: Would my conduct be legal? Would my conduct be ethical? Does my conduct comply with Revasum's policies? Does my conduct appear appropriate or would I be embarrassed if someone knew about my conduct? Who will be affected by my conduct? Would it be improper for me to act or fail to act? Would acting or failing to act make the situation worse? Would my conduct put Revasum or me in a compromised position?

Ask Questions & Report Concerns

Maintaining our reputation for ethical behavior depends upon all of us working together to make ethical decisions. It is important that any ethics-related concern or issue be brought promptly to the Company's attention so that it can be appropriately addressed. Remaining silent while aware of inappropriate or unlawful conduct is simply not acceptable.

Non-Retaliation Policy

Revasum forbids retaliation against any member of its workforce for reporting in good faith a possible violation of these Standards or any other Company policies, or for initiating or testifying, assisting, or participating in any manner in any investigation, proceeding, or hearing. You should not be afraid to report any misconduct, ask questions about your ethical responsibilities, or raise concerns about potentially unethical or questionable behavior of others. Employees who retaliate or attempt to retaliate are subject to disciplinary action, up to and including termination of employment. Retaliation is not tolerated.

Resources

A number of resources are available to answer questions and help you determine an appropriate course of conduct. You may bring your questions and concerns to the attention of the Company by discussing them with your supervisor or another member of management. If you are uncomfortable speaking with your supervisor, contact another manager in your organization, a representative in the Human Resources Department, CEO or CFO. You may also email the Compliance email at compliance@revasum.com — which will automatically be distributed to the CEO, the CFO, and the independent Audit Committee Chairman.

Core Values

By creating and maintaining an environment that supports our core values of mutual trust and respect, being close to the customer, and world class performance, each of us individually and the Company as a whole are better positioned to succeed. Acting with honesty and integrity is fundamental to achieving our core values. While everyone at Revasum is responsible for modeling

these core values, our executives and others in management have a special responsibility to lead by example and to set and communicate standards that allow all of us to excel.

Positive Work Environment

All members of our workforce share the responsibility for promoting mutual understanding and cooperation and for creating and maintaining a work environment in which discrimination and harassment are not tolerated. We do not unlawfully discriminate or tolerate harassment based on: race, color, national origin, ancestry, religion, age, sex (including pregnancy, childbirth or related medical conditions), sexual orientation, gender identity, marital status, physical disability, mental disability, medical condition, genetic information, family care leave status, veteran status, or any other basis prohibited by law. This applies to all workforce-related decisions and actions, including but not limited to recruitment, hiring, training, compensation, benefits, promotion and social and recreational programs.

Issues can only be addressed and resolved if they are brought to the Company's attention. For that reason, we are each responsible for reporting concerns we may have. Please remember that Revasum's Non-Retaliation Policy forbids retaliation against any member of its workforce for reporting in good faith a possible violation of these Standards or any other Company policies. You should not be afraid to report any misconduct.

Please refer to Revasum's Human Resources Policy Manual for additional information concerning appropriate conduct in the workplace. Some Human Resources policies may vary by region due to differences in local law.

Conflicts of Interest

Generally, members of our workforce may conduct their personal, social and financial affairs as they wish. However, there are situations and activities that may pose a conflict between your interests and the best interests of the Company, which can raise questions regarding your loyalty to Revasum. A conflict of interest occurs when you place, or give the appearance of placing, your personal interests ahead of Revasum's interests. Conflicts of interest can also cast doubt on your ethical judgment and objectivity, and affect others' perception of you and the basis upon which you make decisions.

You should avoid any relationship, influence or activity that would cause, or appears to cause, a conflict of interest. We expect that you will not directly or indirectly engage in activities in which your responsibilities or loyalties to the Company may be compromised. You are expected to make or participate in business decisions based on the best interests of Revasum and not based on personal relationships or personal benefit.

All Potential Conflicts of Interest Must be Disclosed

Transparency (i.e. making sure your actions are disclosed and visible) is essential to avoiding conflicts of interest. All members of our workforce are required to disclose any potential or actual activity in which their interests may be in conflict with the Company's interest. The obligation to

disclose potential conflicts of interest continues throughout the time you work at Revasum. Although such activities are not automatically prohibited, written approval from your first level manager and the CEO is required to participate in any such activity.

When in Doubt, Seek Guidance

In light of the global nature and diverse scope of our business, a potential conflict may arise in areas with which you are not familiar. If you are uncertain whether your activities may constitute a conflict of interest, or even the appearance of a conflict of interest, consult with your supervisor, the Human Resources Department, the CEO, or CFO.

Types of Conflicts of Interest

The following sections outline requirements and approval processes for some specific areas in which conflicts of interest may arise. It is not intended to be an exclusive list. As noted above, all conflicts of interest must be disclosed and approved in advance.

Outside Employment, Business Activities and Consulting

- Employees may not be employed by, or contract or consult with, a customer, supplier or competitor of Revasum or its related entities while employed at Revasum.
- Employees may not engage in outside business activities, consulting or employment that competes or appears to compete with the interests of Revasum or that adversely affects performance at Revasum.
- Employees must obtain written approval from the CEO or CFO before engaging in any outside business activities, consulting or employment.
- All other members of the workforce (including directors, contractors, temporary workers and consultants) must disclose to the CEO and CFO any outside business, consulting or employment that conflicts or appears to conflict with the Company's interests.

Outside Boards of Directors, Advisory Boards and Venture Capital Funds

- Prior approval from both the employee's direct supervisor and the CEO is required for any employee to serve as a director, officer or advisor to an outside company or for profit entity.
- Employees may not serve as a director, officer or advisor to any competitor of Revasum or a company in which Revasum has invested (except where service for a portfolio company is at the request of Revasum).
- Similarly, members of our workforce may not serve as a director, officer or advisor to an outside company, venture fund, or other entity if such service would create a conflict of interest or the appearance of a conflict of interest.
- Memberships on non-profit charitable boards do not require prior Company approval.
 However, if the charitable organization, in the past or currently, has a business relationship
 with Revasum, has received/receives significant funding from Revasum, or has
 received/receives a grant from the Revasum, then the employee's board service with that
 particular charitable organization should be disclosed to Human Resources and the CEO

- for review and monitoring. Charitable board service must not interfere with your responsibilities to Revasum or reflect negatively on the Company.
- Members of our workforce who serve as a director, officer or advisor to an outside company or other entity must refrain from taking part in any discussions or decisions and abstain from voting on any matter directly or indirectly relating to Revasum.

Outside Transactions

- You may not direct or work on transactions on behalf of Revasum with any person or entity (i) in which you or a member of your family has a substantial beneficial interest or (ii) in which you serve as a trustee or in a similar fiduciary capacity.
- You may not engage in significant financial transactions with other members of Revasum's workforce with whom you have a reporting relationship, or with whom you have a relationship which will pose, or appear to pose, difficulties for supervision, security, safety or morale.

Financial Interests in Other Companies

The following limitations apply to employees' financial interests in companies that are customers, suppliers or competitors to Revasum.

- **Financial Interests in Public Companies:** Employees may hold up to two percent of the outstanding shares of a publicly-owned company that is a customer, supplier or competitor of Revasum.
- Financial Interests in Private Companies (Customers and Suppliers): Employees may hold up to five percent of the outstanding shares of a privately-owned company that is a customer or supplier of Revasum, provided that the financial interest does not compromise, or appear to compromise, the employee's judgment, objectivity or loyalty to Revasum.
- **Financial Interests in Private Companies (Competitors):** Employees may not hold a financial interest in a privately-owned company that is a competitor of Revasum.

You must obtain approval from Revasum's Chief Executive Officer and legal counsel for any variance from the above limitations.

Revasum's Board of Directors

Specific legal and ethical requirements apply to members of the Company's Board of Directors. "Related party transactions" can present a heightened risk of potential or actual conflicts of interest and accordingly (i) they must be disclosed to the Audit & Risk Management Committee of the Board, and (ii) they generally should be avoided, even if the Board member does not directly participate in the transaction.

The Audit & Risk Management Committee is responsible for reviewing and investigating any matters relating to the integrity of management, including conflicts of interest and compliance with the policies contained in these Standards of Business Conduct. All directors must recuse

themselves from any discussion or decision affecting their personal, business or professional interests. Any waiver of the Standards of Business Conduct involving a director or an executive officer of Revasum may be granted only by Revasum's Board of Directors and only if it is in the best interest of Revasum and its stockholders. Any such waiver shall be disclosed in Revasum's applicable filings with the ASX as required.

Issues can only be addressed and resolved if they are brought to the Company's attention. For that reason, we are each responsible for reporting concerns we may have. Please remember that Revasum's Non-Retaliation Policy forbids retaliation against any member of its workforce for reporting in good faith a possible violation of these Standards or any other Company policies. You should not be afraid to report any misconduct.

Use of Company Assets and Electronic Communications and Data Systems

We are each personally responsible for the proper use of Company property, facilities and equipment. In our dynamic business, we must use Company assets as efficiently as possible and remain alert to opportunities to improve performance and reduce costs. In addition, you are responsible for protecting the resources entrusted to you. You must not remove or borrow Company property without permission from the appropriate authority.

You are provided with access to Company telephones, computer systems, workstations, mobile devices, voicemail, email, word-processing, internet, videoconferencing, teleconferencing, and other electronic communication or data storage systems for use in carrying out Company business. While the primary purpose of these systems is business use, you may use these systems to send and receive occasional and incidental personal communications or to prepare and store incidental personal data (such as personal calendars, address lists, etc.), so long as such use: does not interfere with work duties, is not illegal, is not done for monetary or personal gain, does not involve "spamming" or other mass or excessive distributions, does not conflict with Revasum's interests, and does not violate Revasum's policies or procedures. You must not use Company resources to create, distribute, store, access or display messages or materials that are threatening, harassing or of an unprofessional nature. If you wish to engage in discussion or promotion of political, social, religious, personal, financial, or commercial views, you must do so on non-work time with your own personal email account and equipment.

Data Privacy

Many countries have implemented, or are planning to implement privacy laws on the appropriate use, handling, storage, disclosure and transfer of personal information. Personal information is any information that can be used to identify a person, such as birth dates, social security numbers, national identification numbers, home addresses, telephone numbers, credit card numbers or other sensitive or personal information. We are committed to reasonably protecting the privacy expectations of everyone we do business with, including our customers, suppliers and workforce. Safeguarding personal information is critical in maintaining trust in the Revasum brand.

Each of us therefore has a responsibility to comply with information security and privacy requirements when personal information is collected, used, processed, transmitted and shared. When issues, concerns or questions arise, consult with the Information Technology department or the CEO or CFO.

Protection of Company Confidential Information and Intellectual Property

Our intellectual property and confidential information are the lifeblood of Revasum. All members of our workforce must protect and not disclose information about the Company that is not generally available to the public or has not been published or widely disseminated ("Confidential Information").

Confidential Information can include business information (such as plans, projections, customer lists, cost and customized pricing schedules, and market data) and technical information (such as designs, semiconductor process data, formulas, and "know how"). Much of the information accessible to you as an employee will qualify as Confidential Information.

As a member of our workforce, you must follow Company guidelines to protect our Confidential Information, including the following:

- Ensure that a nondisclosure agreement, approved by the Company's legal counsel, has been signed before providing any Confidential Information to any third party.
- Limit access to Confidential Information, even within Revasum, to only those persons who have a genuine need to know.
- Maintain control over all Confidential Information and label such information to indicate who may have access to it.
- Shred or securely store excess or obsolete documents containing Confidential Information.
- Keep information only for the purpose and length required. See Global Data Retention Policy for guidelines.

Even in social situations, you must remember that you represent the Company and your obligation to protect Confidential Information continues. Do not share Confidential Information with friends, family or former colleagues.

At Revasum, we are committed to protecting, maintaining and promoting a culture of information safety. We carry out this responsibility by ensuring that effective information safety training is provided and protective measures are in place. Each of us must adopt and enforce safe information handling and processing practices and comply with all applicable laws and regulations and Company policies in order to ensure those protective measures are effective and maintain a safe information handling and processing environment. You must also be careful to protect and not disclose Confidential Information about other companies that you obtain in the course of your employment, e.g., in the course of joint development, joint venture or acquisition or merger activities. In addition, you should refrain from commenting on our competitors', customers' or suppliers' businesses.

The Company's policy on handling Confidential Information applies to you while you work at Revasum and after you leave the Company. This means that you have a continuing obligation not to disclose Confidential Information you learned while working at Revasum, and you must return any documents containing Confidential Information before you leave the Company.

Confidential Information and the Internet

You should not post or share nonpublic information about Revasum in Internet discussion groups, chat rooms, bulletin boards and/or other electronic communications media or social media site, even under an alias, for any purpose. Even if you want to "set the record straight" about what you perceive to be a false statement about the Company that has been posted by someone else, your posting might be misinterpreted, start false rumors and/or may be inaccurate, false or misleading. For more information, please refer to your local HR Policy Manual.

In addition to violating these Standards, disclosing Confidential Information, participating in chat rooms and/or posting information about the Company on Internet investor websites or other electronic communications media could also be a violation of civil and criminal laws.

Contacts with Investors, Analysts or the Media

Unless explicitly authorized for a specific purpose, you should not have contacts or communications about any topics or matters related to Revasum with the media, investors, stock analysts or other members of the financial community. All inquiries concerning or in any way related to the Company from stock analysts, investors or other members of the financial community should be promptly referred to the CEO or CFO. All inquiries concerning or in any way related to the Company from the press and media should be promptly referred to CEO. Members of our workforce who have been specifically authorized to respond to inquiries should always use materials approved by CEO.

Inventions and Patents

All inventions, whether patentable or not, that you conceive or reduce to practice while performing employment activities or contractual duties at Revasum are the property of Revasum. An exception to this rule is for inventions that are not related in any way to Revasum's products, research or business, are developed entirely on your own time, and are developed without the use of any of Revasum's assets, equipment, facilities, or resources.

After conceiving an invention, you must promptly submit an Invention Disclosure Form to the Company's legal counsel, even if you are unsure or doubt that the invention is patentable or will be used in a product. Public disclosure of information regarding the product or service before the patent is filed may jeopardize the patentability of the product, highlighting the importance of your compliance with the Company's Non-Disclosure Policy

Trademarks

Our Company logo is the most recognized symbol of Revasum and is designed to reflect consistently the Company's values and attributes. Professional use of the Company logo requires strict adherence to Company standards and trademark law. You must consult with the Marketing department before using the Company's logo or trademarks on printed documents, corporate gifts and other items.

Recordkeeping and Accounting Practices

Records are a vital component in maintaining our high standard of ethical business conduct. Accurate and complete Company records must be kept by every member of our workforce. It is essential to record and report information accurately and honestly, without misleading, misrepresenting, misinforming, making false statements or omitting important information. The following activities are prohibited:

- Making payments without supporting documentation or for a purpose other than that described in supporting documentation.
- Establishing undisclosed or unrecorded Revasum funds, assets or liabilities.
- Making false or misleading entries in, or omitting important information from, Revasum's records.
- Seeking reimbursement of personal expenses that are not reasonable business expenses or using Revasum's assets or opportunities for personal financial gain.
- Failing to comply with generally accepted accounting principles.

Revasum does not tolerate dishonesty, including false recordkeeping. Do not in any way falsify, omit important information from, or tamper with, Revasum's books and records, or even consider doing so. If you are aware of or suspect false recordkeeping or representations by others, you must report such activities promptly to compliance@revasum.com.

Unauthorized Side Deals and Side Letters are Prohibited

It is critical that all agreements entered into by Revasum are formally documented. The terms and conditions in an agreement define the rights, obligations, and liabilities of Revasum and the other party, as well as the accounting treatment for the particular transaction. Business commitments made outside of the formal contracting process, known as "side deals" or "side letters," are strictly prohibited. Similarly, you should not make any oral or written commitment that creates a new agreement or modifies an existing agreement without going through the required process, including obtaining prior approvals from the CEO and/or CFO as defined by the Company's then current Delegation of Authority.

If you become aware of any side deal, side letter, or agreement made outside of the required contract approval process, report it promptly to your manager, the CEO, and the CFO.

Issues can only be addressed and resolved if they are brought to the Company's attention. For that reason, we are each responsible for reporting concerns we may have. Please remember that Revasum's Non-Retaliation Policy forbids retaliation against any member of its workforce for reporting in good faith a possible violation of these Standards or any other Company policies. You should not be afraid to report any misconduct.

Business Gifts, Meals And Entertainment

At Revasum, we believe that business decisions must be based on objective standards and established business needs. While the occasional exchange of modest business gifts, meals, and entertainment can help us strengthen business relationships, such exchanges must be offered and accepted only within strict guidelines. Always use sound judgment and moderation in your gift giving and business entertainment on behalf of Revasum. Members of our workforce are prohibited from offering or accepting gifts or other business courtesies that could be illegal, violate Company policy, put someone in a compromised position, create a sense of obligation, or create the appearance of an intent to improperly influence a business relationship or decision. Similarly, acceptance of a gift should not create, or appear to create, a conflict of interest or the impression of an improper advantage.

Gifts must be infrequent, given openly, reasonable in value, appropriate to the circumstances and incidental to a legitimate business transaction or relationship. Gifts must also be compatible and appropriate in value and kind for the region and culture in which they are given. In some cases, gift giving or receiving requires approvals, documentation or disclosures.

Additional Requirements for Gifts to Government Officials

Special rules apply to gifts, business meals and entertainment for government officials, including employees of state-owned entities. Gifts, meals and entertainment must not be provided with the intent of corruptly influencing an official's purchasing or regulatory decision or giving any other improper advantage to Revasum. The gift, meal or entertainment must always be permissible under local law and must not be provided in a manner or with such frequency so as to create an appearance of impropriety.

Advance written approval from the CEO or CFO is required before offering or providing gifts or travel to a government official.

Anti-Corruption Policy

Revasum is committed to winning business based on the merits and integrity of our products, services and people. We do not tolerate bribery or corruption, in any way or form.

International anti-corruption laws, including the U.S. Foreign Corrupt Practices Act (FCPA) and commercial bribery statutes, prohibit giving government officials and private parties (the employees of our customers, suppliers, or other business partners) anything of value with the intent of obtaining preferential business treatment. "Anything of value" is broadly interpreted, and there is no exception for small or "nominal value" gifts or for payments designed to facilitate routine

government actions, such as granting a license to do business or processing government papers to issue a visa or work permit (commonly referred to as "facilitation payments").

International anti-corruption laws also prohibit creating inaccurate or false books and records relating to payments to any third party. All transactions involving the Company's funds or assets must be recorded in reasonable detail and accurately and completely reflect the transactions of the Company.

Revasum's Anti-Corruption Policy requires all members of the workforce, and all other persons or agents doing work on behalf of Revasum, to strictly comply with the following rules:

- Do not offer, promise or pay bribes or kickbacks to anyone or engage in other corrupt practices while conducting Revasum's business.
- Do not request or accept any bribes or kickbacks from anyone or engage in other corrupt practices while conducting Revasum's business.
- Do not make any offer or payment of anything of value that you believe or even suspect might be for the benefit of a foreign official, government, political party, candidate, public international organization, or employee of a state owned, operated or controlled enterprise without prior, written approval from the CEO or CFO.
- Do not ignore corruption warning signs. If you have any knowledge or suspicion of corrupt activity or have been asked to make an improper payment, report it as soon as possible to compliance@revasum.com.
- Do not make or agree to fee arrangements that are inflated.
- Do not make false or incomplete entries in Revasum's books and records.

A violation of the FCPA can result in serious consequences for the individual involved and for the Company. Criminal sanctions for the anti-bribery provisions can include up to large monetary fines for the Company, and imprisonment and monetary fines for individuals.

Revasum requires that you obtain prior approval from the CEO or CFO before offering or providing gifts or travel to any government official. If you have any doubts or are unclear about your responsibilities under this Anti-Corruption Policy, consult with an CEO or CFO.

Issues can only be addressed and resolved if they are brought to the Company's attention. For that reason, we are each responsible for reporting concerns we may have. Please remember that Revasum's Non-Retaliation Policy forbids retaliation against any member of its workforce for reporting in good faith a possible violation of these Standards or any other Company policies. You should not be afraid to report any misconduct.

International Business Conduct and Human Rights

We recognize that laws vary from country to country and that the global business environment is always subject to change. We expect members of our workforce to comply with all applicable laws and regulations and to seek appropriate guidance when faced with issues and concerns. Without limitation, as a global company, Revasum prohibits the use of child labor, and the use of forced, bonded, or indentured labor practices in our operations. Additionally, we forbid harsh or inhumane treatment, including corporal punishment or the threat of corporal punishment.

We also set expectations for social responsibility in our supply chain. Our vendors and suppliers are expected to comply with Revasum's Standards of Business Conduct.

Workplace Safety

At Revasum, we are committed to protecting, maintaining and promoting the safety, health and general well-being of our workforce. We carry out this responsibility by paying constant attention to the health and safety of our workforce and by ensuring that effective safety training is provided and protective measures are in place. Each of us must adopt and enforce safe work practices and comply with all health and safety laws and regulations and Company policies in order to ensure those protective measures are effective and maintain a safe work environment.

Concerns about unsafe conditions must be reported to your manager or compliance@revasum.com as soon as possible.

Antitrust and Unfair Competition

Antitrust laws protect competition in the marketplace by prohibiting unfair agreements that restrain trade and other types of anticompetitive conduct. It is our policy to compete fairly and in compliance with all applicable antitrust laws.

To ensure that we are complying with antitrust laws worldwide, it is critical that you do not engage in any of the following practices. If you become aware of any of the activities listed below, you should promptly report the activity to your manager or the CEO or CFO:

Prohibited Practices regarding Competitors

- Entering into an agreement, understanding or arrangement (whether formal, informal, written, oral, express or implied) with one or more competitors regarding any of the following:
 - o prices, price-related sales terms (e.g. discounts, credits or trade-in allowances), timing or announcement of price changes, or any other terms and conditions of sale;
 - o sharing, dividing or otherwise allocating geographic or product markets, sales territories, customers, or bids;
 - o controlling or limiting sales volumes, production, capacity, investment or R&D;
 - o prices, terms and conditions to be submitted in response to a bid request, or discussion of bid strategy;
 - o jointly refusing to do business with or boycotting customers, suppliers or distributors.
- Discussing or even being present while competitors are discussing prices, terms of sale, and the like at trade association or other professional meetings.
- Exchanging confidential or competitively sensitive information with a competitor, including:
 - o Prices: including margins, date of price changes;

- Marketing: product/technology launch information, advertising budgets, marketing plans, market shares;
- O Customers: current or upcoming bids, terms and conditions of sale and purchase, credit terms, warranty terms, service support, spare parts policies, etc.; Suppliers: terms and conditions of purchase, volumes, etc.;
- Sales volumes, production capacity, R&D plans/investment, business or product strategy

Prohibited Practices regarding Customers

- Refusing to sell a product or service without the purchase of another of Revasum's products or services or a condition not to purchase a competitors' products or services (known as a "tie-in" or "tying").
- Without obtaining CEO, requiring a customer to purchase 100% of its requirements of a particular product exclusively from Revasum.
- Pricing a product below cost without obtaining CEO approval.
- Representing used systems or parts as new, or representing refurbished systems or parts as original.
- Making inaccurate or misleading claims about Revasum or our products, including making false or deceptive comparisons with competing products.
- Failing to warn customers of known dangers in connection with use of our products.
- Encouraging or causing a breach of contract between our competitors and their customers or suppliers.
- Misrepresenting Revasum's trademark, copyright, trade secret, patent or other intellectual property rights.
- Making false or misleading comments about competing products or about other parties with whom we have commercial dealings or about the nature of those dealings.

Prohibited Practices regarding Suppliers and Resellers

- Without obtaining CEO approval, requiring a supplier to sell one or more of its products only to Revasum or prohibiting the supplier from selling one or more products to others.
- Agreeing with a supplier that we will resell the supplier's product at or above a particular price.
- Agreeing with a distributor or reseller that a particular Revasum product will be resold at or above a particular price or requiring the distributor or reseller to maintain or exceed a particular price in reselling the product.
- Without obtaining CEO approval, requiring that a supplier purchase Revasum's products if we purchase from the supplier.

Violations of antitrust laws may result in severe penalties for Revasum and the individuals involved, including substantial fines and prison sentences. Our workforce, especially those persons involved in sales, purchasing and dealings with competitors, are required to understand U.S. and foreign antitrust laws and know how these laws may affect our workforce's activities.

Confidential Information and Intellectual Property of Others

In the same way that each of us is responsible for protecting Revasum's intellectual property, we are also responsible for respecting and protecting the confidential information and intellectual property rights of our customers, competitors, suppliers and other third parties with whom we do business. Under no circumstances should you improperly acquire or attempt to acquire the trade secrets or other proprietary or confidential information of others. The following list includes a few examples of activities that are prohibited and should be promptly reported to your manager or compliance@revasum.com:

- Unauthorized use or disclosure of another company's confidential information or trade secrets;
- Unauthorized use or disclosure of a former employer's confidential information or trade secrets:
- Encouraging a competitor's employees to improperly disclose trade secrets or confidential information;
- Hiring a former employee of a competitor, customer or supplier for the purpose of gaining access to that company's confidential information or trade secrets; and
- Inducing a customer or supplier to improperly disclose confidential information or trade secrets about competitors.

Due to the technical nature of our products, we often need to supply a customer or supplier with confidential information or trade secrets, or to accept the same from a customer or supplier. Circumstances also may arise in which such information is available from a competitor. You should always have in place a signed nondisclosure agreement that has been approved by the Company's legal counsel before providing or receiving any confidential information or trade secrets with parties outside of Revasum.

Revasum takes seriously its obligations with respect to the protection of confidential and proprietary information belonging to other companies. If you receive information under a nondisclosure agreement ("NDA"), you should review the terms of the NDA and ensure that you have a plan for how you are going to protect the information as required by the agreement. Be sure to comply with all restrictions that another company and Revasum have agreed to place on the use or disclosure of such information. If circumstances change, you must obtain the necessary authorizations to use or disclose such information outside its original purpose.

You should also refrain from commenting about pricing, sales, production, marketing and other related business activities of our competitors, customers and suppliers.

Copyright

Copyright laws protect many types of materials that we use. For example, copyright laws often protect books, pamphlets, seminar materials, journals and computer software. We do not tolerate unauthorized reproduction of copyrighted material.

The commercial computer software that we purchase from our suppliers is also copyrighted and generally will be licensed under specific terms. Therefore, in some cases, copying software for use on more than one computer is improper. Also, downloading software from a network may be improper in some circumstances. If you have any doubts about whether you are authorized to copy, use or download computer software, you are required to consult with an attorney in the Law Department before doing so. You must also report any unauthorized use of copyrighted material, including software, to the CEO, the CFO, or compliance@revasum.com.

Selection and Treatment of Suppliers

Revasum treats all suppliers and potential suppliers fairly. We select suppliers based on their products, services and business practices. We expect you to deal with suppliers fairly and in accordance with Revasum's policies. If you are responsible for receiving bids, you should provide all qualified suppliers with the Company's technical and business requirements. When selecting suppliers, you must assess each qualified supplier's ability to meet technical specifications and satisfy our requirements relating to quality, timeliness, and the ability to provide materials on an ongoing basis. In addition, you must make purchasing decisions based on the long-term cost and benefit to Revasum.

It is important that you avoid any appearance of impropriety in your dealings with suppliers.

- Promptly disclose any personal or family relationship between yourself and a potential supplier.
- Accept business gifts, meals or entertainment from a supplier only if they nominal in value.
- Do not offer, give, solicit or accept "kickbacks." A kickback refers to anything of value or compensation of any kind, which is provided, directly or indirectly, for the purpose of improperly obtaining or rewarding favorable business treatment. Do not offer, give, solicit or accept anything of value that is, or even appears to be, improper or irregular.
- Report any kickbacks that you become aware of or suspect to compliance@revasum.com.

If you have any doubt regarding the propriety of your actions in a given situation, contact an compliance@revasum.com.

Insider Trading And Tipping

You must always be aware of and comply with securities laws and regulations. United States federal and state securities laws and Australian laws prohibit insider trading, that is, buying or selling Revasum's securities at a time when you are aware of material, nonpublic information relating to Revasum. This prohibition also applies to trading in the stock of our customers, suppliers or other business partners if you become aware of any material, nonpublic information relating to one of those companies.

While there is no precise legal definition of "material, nonpublic information," it is commonly considered information about a company that is not known to the general public and that a reasonable investor would consider important in making a decision to buy, sell or hold the company's securities. Quantitative or qualitative factors may be considered, depending on the nature of the information.

Do Not Engage in Insider Trading

If you possess any material, nonpublic information, you must refrain from buying or selling Revasum's securities until after the information has been disclosed to the public and absorbed by the market (in most cases, the first safe day to trade is the second trading day after the disclosure).

The fact that you have material, nonpublic information is enough to bar you from trading; it is no excuse that the reasons for trading were not based on that information. Even if you had a long-standing plan to sell Revasum's shares to pay a tuition bill, you may not do so if you are aware of material, nonpublic information about Revasum at the time of sale.

Do Not Engage in Tipping

Passing material, nonpublic information to someone else who may buy or sell securities — which is known as "tipping" — is also illegal, as is trading securities on the basis of a tip or information that involved material, nonpublic information. These prohibitions against tipping apply to stock, options, debt securities or any other securities of Revasum, as well as to securities of other companies on which you have material, nonpublic information.

Joining an Expert Network is Prohibited

Revasum's prohibitions on insider trading and tipping include communications with, or membership in, an "expert network" company or any company that retains various experts to consult on a particular company (e.g. Revasum), industry or technology, with the intent or result of obtaining material, nonpublic information. If you are contacted by an expert network, decline the invitation to join and do not discuss your work at Revasum or Revasum's customers or suppliers with any of their representatives.

"Blackout" Requirements

Members of the Board of Directors, officers and certain persons within Revasum with access to nonpublic financial results or information about material transactions or events (these groups of people are referred to as "insiders") must refrain from buying or selling Revasum's stock for the period specified in a quarterly or special blackout period. Insiders and other members of our workforce whose responsibilities include access to corporate financial results should never sell Company stock short or trade in options on the Company stock.

Insider trading and tipping are prohibited, and you should report any such conduct of which you become aware. For more information on insider trading, you should refer to the Company's Securities Trading Policy on the Company's website:

https://investors.revasum.com/FormBuilder/_Resource/_module/OUTCn5-Mi0a8St2_vMvKUA/file/1915042.pdf

Continuous Disclosure

Continuous Disclosure as provided by ASX listing rules (for "Continuous Disclosure") provides set of procedures and guidelines to ensure that it complies with its disclosure obligations in accordance with all applicable legal and regulatory requirements, including ASX Listing Rules. The rules are intended to provide all investors with material information about a company. For more information on Continuous Disclosure, please refer to the Company's policy on the Company's website:

https://investors.revasum.com/FormBuilder/_Resource/_module/4-3fXixhCkS1sAK1mGHihA/docs/continuous-disclosure-policy.pdf

Environment

We believe that taking care of the environment is part of our corporate responsibility to current and future generations. The Company also encourages our suppliers and contractors to improve their environmental, health and safety performance. Revasum, like all other companies that manufacture high technology products, uses regulated chemicals and raw materials and generates wastes. Each of us is responsible for full compliance with all applicable environmental laws and regulations and Company policies, as required by our roles in the Company. The following list contains only a few examples of environmental activities that are regulated:

- Transporting, treating, handling, storing, and disposing of hazardous materials and waste;
- Releasing hazardous substances into the environment, even in small quantities;
- Manufacturing, using, distributing or disposing of certain toxic substances;
- Emitting air pollutants; and
- Discharging pollutants into or onto the ground or into groundwater or surface water.

You must be aware of your responsibilities to protect the environment and to strictly comply with environmental laws and regulations while performing your daily work. To that end, we provide training for members of our workforce to ensure that environmental protection measures are met. Individuals, as well as the Company, are subject to civil and criminal liability for violation of environmental laws and regulations.

Because of the extent and complexity of environmental regulations, you should consult with your supervisor, the CEO, the CTO, or the CFO if you have questions or concerns about your responsibilities under relevant laws, regulations or Company policies.

Taxes

Revasum strictly complies with all applicable tax laws, including federal, state and foreign laws. These laws require the reporting of financial information, payment of taxes due, filing of tax returns, and withholding or collecting of necessary taxes on behalf of our workforce. Contact the Finance Department if you have any questions about the Company's responsibilities under tax laws and regulations.

Import, Export and Anti-Boycott Law

We are a global company with worldwide customer base in many countries. More than half of our total sales are derived from sales outside the United States.

We are fortunate to have earned our reputation of responsible, international, corporate citizenship. To maintain our global standing, each of us must strictly comply with applicable laws, including those of the United States and other countries that govern the import, export and re-export of our products. Any violation of these laws, even through ignorance, could have damaging and long-lasting effects on our business.

When importing products, you must obey the import requirements of various governmental agencies. All questions and inquiries for information pertaining to the identity, value or duty due on imported products must be answered truthfully and completely.

When exporting or re-exporting products, you must comply with the laws and regulations of the U.S. Department of Commerce and other laws pertaining to the export and/or reexport of products, spare parts, accessories, training materials and technical data. Current United States' policies also require caution in disclosing restricted technical data in the United States to a non-U.S. citizen working in the United States. In some cases, you may be required to obtain individual export authorizations for certain members of our workforce who have access to controlled technology, software or information while they are working in the United States.

The intent of the United States' export control laws is to protect national security, support foreign policy and prevent the proliferation of chemical and biological weapons, missile technology and nuclear capability. If your responsibilities include exporting products, you are responsible for ensuring customers and transactions are screened to ensure that we comply with all export requirements.

When exporting or re-exporting, you agree to comply strictly and fully with all export controls imposed by any country or organization or national government within whose jurisdiction you operate or do business. You agree not to export or permit exportation for any products, materials, software or related technical data ("commodities") without complying with the export controls in the relevant jurisdiction. In particular, Representative acknowledges that Revasum commodities are subject to United States (U.S.) Department of Commerce, Bureau of Industry and Security (BIS) laws and the Export Administration Regulations ("EAR") controlling the exports of commodities, and will not export without first obtaining the written consent to do so from the appropriate agency or other governmental entity in accordance with applicable export and trade control laws. The EAR currently, among other restrictions, prohibits export or re-export of Revasum's commodities to certain countries, entities, and end-users, including to prohibited parties on the BIS Entity List. You also acknowledges that Revasum and its employees, as well as any agents or sub-agents performing duties under this Agreement, are subject to the U.S. trade sanctions laws and regulations or restrictions that prohibit any dealings or involvement with, or transfers to, or from, any party designated by the U.S. Department of Treasury's Office of Foreign Assets Control ("OFAC"), in consultation with the U.S. Department of State, and included on OFAC's Specially Designated Nationals ("SDN") list, or involving transfers to or from certain

prohibited countries (i.e., Cuba, Iran, North Korea, Syria, Sudan, Crimea region of Ukraine.) Violation of U.S. trade and export control laws is strictly prohibited.

Revasum is prohibited from participating in trade boycotts that are not sanctioned by the U.S. government, including, but not limited to: agreements to discriminate, refusals to do business with certain countries or companies blacklisted by other governments, or letters of credit that require boycott-related acts. To ensure compliance with antiboycott laws, always have the CFO review agreements, transactions, and letters of credit that contain potential boycott-related language.

You should direct any questions you have regarding imports or exports of Revasum's products, parts or technology to the CEO or CFO.

Corporate Philanthropy Program

As a socially responsible corporate citizen, we are committed to making a meaningful and positive contribution to the communities in which we do business. As part of that commitment, we maintain a corporate philanthropy program to support organizations and activities in these communities. Our program complies with all applicable governmental guidelines. Revasum has a policy not to provide support to religious or fraternal organizations, individuals or ongoing capital or endowment fundraising campaigns.

We donate time, energy and resources where we can have the greatest impact. Although we encourage participation in such programs and activities, members of our workforce should not ask suppliers, customers or other companies with whom we do business to support fundraising efforts of any kind, including Company-related activities or personal fundraising, even if it is for charitable or non-profit purposes.

Government Contracts

Revasum sometimes enters into product or service contracts with the United States and governments of other countries, government agencies and government contractors. These contracts may be subject to special regulations and impose special requirements on the Company and our workforce.

In the United States, for example, a number of laws have been enacted to assure the truth of any representations made to government agencies and to assure the quality of goods and services provided to the government. Such regulations require that our business conduct conforms to stipulated pricing, contracting and certification requirements. In certain situations, it may be necessary to certify that we are providing the lowest commercial price and that such price has been determined independently. United States laws also prohibit a former government employee from acting on behalf of Revasum in a matter in which he or she was substantially involved while a government employee. Each of us is responsible for making sure that these requirements are met and all government regulations are followed.

Your Obligation to Take Action

Always apply these Standards of Business Conduct, follow Revasum's policies, and comply with laws and regulations. When you are unsure, take the initiative to review applicable policies or consult with the available resources to determine the right course of action. Check with your manager, Human Resources, the CEO, or the CFO. If you would like to talk with someone outside your immediate area, consider contacting compliance@revasum.com.

If you know about a possible violation of our Standards of Business Conduct or legal or regulatory requirements, you are required to promptly notify your manager (provided your manager is not involved in the suspected violation), Human Resources, or compliance@revasum.com. Failure to report potential violations in a timely manner may result in disciplinary action

Participating In Investigations

If your cooperation has been requested during an investigation at Revasum, whether conducted internally or at the request of an outside authority, you must cooperate and be honest and thorough in your responses. If you are required to participate in an investigation, we ask that you not disclose the existence of the investigation or any information you learn or discuss during that investigation, and that you also respect Revasum's policies regarding the confidentiality of company business information.

You should comply with our document retention policies when disposing of documents. You must never conceal wrongdoing or permit others to do so. If you have any questions or concerns about your responsibilities, or actions and responsibilities of others, please contact the CEO or CFO.

Compliance and Consequences

We are committed to attaining the highest ethical standards in our work and in all of our interactions with our workforce, our customers, our suppliers, our competitors and the public.

Each of us is responsible for reading, understanding and upholding these Standards and maintaining our reputation for ethical business conduct. We expect you to comply with the policies set forth in this publication and to rely upon your own high standards. If you or others are ever asked to engage in conduct that is not consistent with Company values or policies, you must speak up and seek guidance. We also expect that you will seek advice, as appropriate, from the available resources to assist you in resolving issues that are not covered by these Standards.

Employees at higher levels and/or in sensitive or management positions are responsible for (1) meeting higher standards of performance and conduct, and (2) appropriately addressing or escalating concerns that are brought to their attention.

These Standards are based, in part, on various laws. You should be aware that violations of local, state, or federal laws may result in criminal penalties for you and/or the Company. You are not to engage in any conduct that you suspect may violate any law and you must report any suspected

violation of these Standards or other Company policies or any law to one of the resources described below. Because of the gravity of the issues addressed in this publication, Revasum may take disciplinary action, up to and including termination of employment for actions that violate these Standards, or other Company policies, or any laws.

Additional Resources and Contact Information

All Revasum policies are available on the ADP portal and/or in hard copy.

You are encouraged to bring any concerns you may have, for example, about your own or someone else's conduct, an uncertainty about the meaning of a particular regulation, or a suspicion that somebody you work with may have done something questionable, to the attention of the Company by discussing them with your supervisor or another member of management. If you are uncomfortable speaking with your supervisor, contact a management representative in the Human Resources Department, the CEO, the CFO, or compliance@revasum.com.

Revasum is committed to treating all information it receives with the highest regard for confidentiality. Information will only be shared with those who have a genuine need to know. If the issue or information relates to certain concerns, this information may have to be shared with the Audit & Risk Management Committee of Revasum's Board of Directors and/or the Company's outside auditors and/or legal counsel.

NOTE

These Standards of Business Conduct are not an employment contract and do not create contractual rights. Revasum reserves the right to amend or discontinue these Standards of Business Conduct and the policies addressed herein, without prior notice, at any time. The online version of the Standards of Business Conduct, available on Revasum's website, supersedes all printed versions.