

ZIMPERIUM, INC.

Equal Employment Opportunity Policy

The employment policy of Zimperium, Inc. is to provide equal employment opportunity for all qualified employees and applicants without regard to race, color, sex, sexual orientation, gender identity, religion, national origin, disability, veteran status, age, marital status, pregnancy, genetic information, or other legally protected status and to ensure affirmative action is taken in fulfillment of this policy. This obligation shall apply to all employment practices including but not limited to:

- Recruiting, hiring, promotion, transfer, demotion, layoff, termination, and training
- Treatment during employment
- Rates of pay or other forms of compensation and benefits
- Selection for training including apprenticeship and on-the-job training as applicable
- Social and recreational activities or programs

This policy is consistent with the requirements and objectives set forth by Executive Order 11246, as amended, Section 503 of the Rehabilitation Act of 1973, as amended, and the Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended. In addition, Zimperium, Inc. does not and will not discriminate against any employee or applicant for employment on any of the aforementioned factors regarding any position for which the employee or applicant for employment is qualified. It is the policy of Zimperium, Inc. not to discriminate because of a person's relationship or association with a protected veteran. This includes spouses and other family members. Also, the Company will safeguard the fair and equitable treatment of protected veteran spouses and family members regarding all employment actions and prohibit harassment of applicants and employees because of their relationship or association with a protected veteran. The chief United States executive of Zimperium, Inc., Shridhar Mittal, has committed to and fully supports the principles of equal employment opportunity and affirmative action.

The objective at Zimperium, Inc. is to employ individuals who are qualified or trainable for positions by virtue of job-related standards of education, training, experience, and other applicable and valid qualifications. Zimperium, Inc. makes and will continue to make every effort to provide reasonable accommodations to any physical and mental limitation of individuals with disabilities and disabled veterans unless such accommodations would impose an undue hardship or direct threat to Zimperium, Inc.'s business.

It is both illegal and against the policy of Zimperium, Inc. for any employee, supervisor, manager, or independent contractor to harass anyone on the basis of race, color, religion, sex, sexual orientation, gender identity, national origin, disability, veteran status, age, marital status, pregnancy, genetic information, or other legally protected status. Ensuring compliance and continued implementation of Zimperium, Inc.'s equal employment opportunity policy is the responsibility of the undersigned.

Employees and applicants shall not be subjected to harassment, intimidation or any type of retaliation because they have (1) filed a complaint; (2) assisted or participated in an investigation, compliance review, hearing or any other activity related to the administration of any federal, state or local law requiring equal employment opportunity; (3) opposed any act or practice made unlawful by any federal, state or local law requiring equal opportunity; or (4) exercised any other legal right protected by federal, state or local law requiring equal opportunity.

The Company will not discharge or in any other manner discriminate against employees or applicants because they have inquired about, discussed, or disclosed their own pay or the pay of another employee or applicant. However, employees who have access to the compensation information of other employees or applicants as a part of their essential job functions cannot disclose the pay of other employees or applicants to individuals who do not otherwise have access to compensation information, unless the disclosure is (a) in response to a formal complaint or charge, (b) in furtherance of an investigation, proceeding, hearing, or action, including an investigation conducted by the employer, or (c) consistent with the contractor's legal duty to furnish information.

In compliance with Executive Order 11246, Section 503 of the Rehabilitation Act of 1973, as amended and the Vietnam Era Veterans' Readjustment Assistance Act of 1974 (VEVRAA), as amended and their implementing regulations, the Company's Affirmative Action Programs will be updated and revised annually based on changes in the Company's workforce, changes in availability data, changes in goals and other changes, as well as revisions of applicable laws, regulations, and processes. The Section 503 and VEVRAA Affirmative Action Programs may be reviewed by an employee or applicant for employment upon request to a Human Resources representative during normal business days between the hours of 8:30 a.m. and 4:30 p.m.

I have designated Annette Wolf to be the Equal Employment Opportunity Coordinator. Annette Wolf has primary responsibility, with assistance from management personnel, for designing and implementing our affirmative action efforts, and for monitoring on an ongoing basis our compliance to stated objectives, identifying problem areas, and addressing all areas of concern. Satisfactory and timely completion of the reporting and monitoring requirements described in the Affirmative Action Program is another requirement of the EEO Coordinator. Further, all management personnel are held accountable for completing specific tasks that support the Company's stated objectives.

DocuSigned by:

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Tracey Dry, Chief Legal Officer and Chief Compliance Officer