

Lexar

Code of Business Conduct and Ethics

Effective Date: April 18, 2025



Code of Business Conduct and Ethics

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Longsys and its US subsidiaries is committed to conducting its business with the highest ethical standards and in compliance with all applicable laws, rules, and regulations. This Code of Business Conduct and Ethics (“Code”) outlines the principles and guidelines that govern our actions and interactions with all stakeholders. We believe that ethical conduct is not just a matter of compliance, but a fundamental aspect of our culture and essential for maintaining the trust and confidence of our employees, customers, suppliers, investors, and the communities in which we operate.

Reporting Violations

We encourage all employees and stakeholders to report any suspected violations of this Code. We are committed to providing a safe and anonymous way to report concerns. Here are the available channels for reporting:

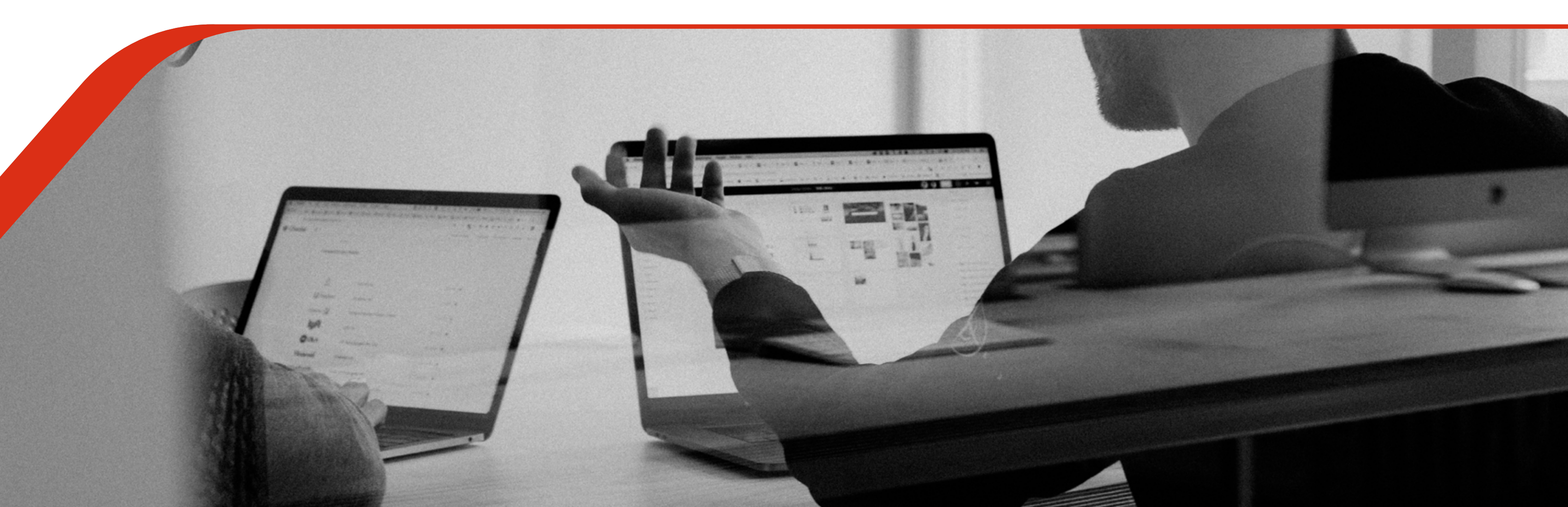
<https://secure.ethicspoint.com/domain/media/en/gui/96576/index.html>

- **WHISTLEBLOWER HOTLINE:** We have established a confidential whistleblower hotline, accessible 24/7, where you can report suspected violations anonymously. The hotline number and reporting instructions are available on our company intranet and through posters displayed throughout the workplace.
- **DIRECT REPORTING:** You can also report violations directly to your supervisor, HR representative, or any member of management.

We will investigate all reported violations promptly and thoroughly. We will not tolerate retaliation against anyone who reports a violation in good faith.

Consequences

Violations of this Code may result in disciplinary action, up to and including termination of employment.



1. Introduction

1.1 Our Commitment

Lexar US is committed to conducting its business with the highest ethical standards and in compliance with all applicable laws, rules, and regulations. This Code of Business Conduct and Ethics (“Code”) outlines the principles and guidelines that govern our actions and interactions with all stakeholders. We believe that ethical conduct is not just a matter of compliance, but a fundamental aspect of our culture and essential for maintaining the trust and confidence of our employees, customers, suppliers, investors, and the communities in which we operate.

1.2 Who This Code Applies To

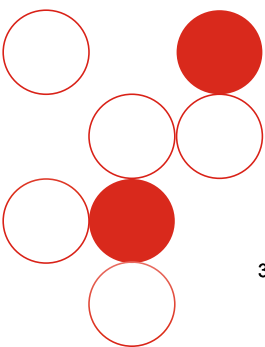
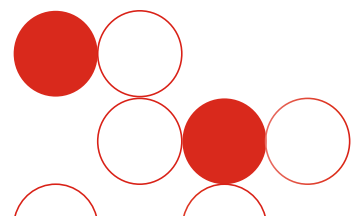
This Code applies to all directors, officers, employees (full-time, part-time, temporary, and contractors), consultants, agents, representatives, vendors, suppliers, partners, and any other individuals or entities acting on behalf of or doing business with Lexar (collectively referred to as “Stakeholders”). We expect all Stakeholders to read, understand, and adhere to the principles and guidelines outlined in this Code.

1.3 Your Responsibility

Each Stakeholder is personally responsible for understanding and complying with this Code. It is your duty to act with integrity, exercise good judgment, and seek guidance when faced with ethical dilemmas. Familiarize yourself with the policies and procedures that support this Code and ensure your actions reflect our commitment to ethical business practices.

1.4 Seeking Guidance and Reporting Concerns

If you have questions about this Code, encounter a situation that may violate its principles, or suspect any illegal, unethical, or improper conduct, you have a responsibility to seek guidance or report your concerns promptly. Lexar is committed to fostering an environment where individuals feel comfortable raising concerns without fear of retaliation. Information on how to seek guidance and report concerns is detailed in Section 7.1.





2. Ethical Conduct and Integrity

2.1 Honesty and Fairness

We conduct our business with honesty, integrity, and fairness in all our dealings. We avoid misrepresentation, deception, and any practices that could be perceived as unethical or misleading. We strive to act in good faith and with due diligence in all our interactions.

2.2 Conflicts of Interest

A conflict of interest occurs when your personal interests could improperly influence your judgment or actions in your role with Lexar. Stakeholders must avoid

situations where their personal interests conflict, or appear to conflict, with the interests of the Company. This includes, but is not limited to:

- Financial interests in competitors, suppliers, or customers.
- Accepting inappropriate gifts, favors, or hospitality.
- Using Company property, information, or position for personal gain.
- Serving in a position with an outside organization that could compromise your loyalty to Lexar.

If you have a potential or actual conflict of interest, you must promptly disclose it to Human Resources and Legal Department. The Company will review the situation and determine the appropriate course of action.

2.3 Confidentiality and Proprietary Information

Confidential and proprietary information belonging to Lexar, its customers, suppliers, or other stakeholders must be protected. This includes trade secrets, business plans, financial data, customer information, intellectual property, and any other non-public information. Stakeholders must:

- Maintain the confidentiality of such information.
- Use confidential information only for legitimate business purposes.
- Not disclose confidential information to unauthorized individuals or entities.
- Take appropriate measures to prevent accidental or unauthorized disclosure.

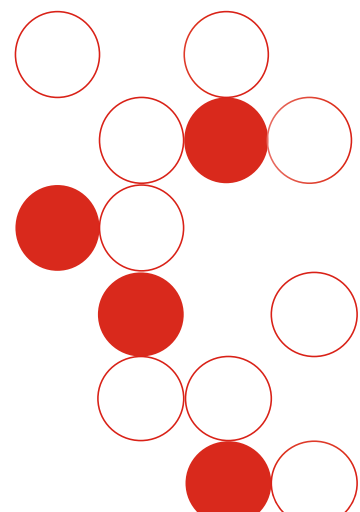
These obligations continue even after your relationship with Lexar ends.

2.4 Protection and Proper Use of Company Assets

All Company assets, including physical property, equipment, software, intellectual property, and financial resources, must be used responsibly and for legitimate business purposes only. Stakeholders are responsible for safeguarding Company assets against loss, theft, damage, and unauthorized use. Waste and inefficiency should be avoided.



3. Compliance with Laws and Regulations



3.1 Anti-Bribery and Anti-Corruption

Lexar strictly prohibits bribery and corruption in any form. We will not offer, promise, give, authorize, solicit, or accept any bribe, kickback, or other improper payment or advantage, whether directly or indirectly, to or from any government official, political party, or private individual to obtain or retain business or secure any improper advantage. Stakeholders must comply with all applicable anti-bribery and anti-corruption laws, including the U.S. Foreign Corrupt Practices Act (FCPA) and other relevant legislation.

3.2 Fair Competition and Antitrust

Lexar is committed to fair competition and will comply with all applicable antitrust and competition laws. We will not engage in activities such as price-fixing, bid-rigging, market allocation, or any other practices that unfairly restrain trade. We will compete ethically and honestly in the marketplace.

3.3 Data Privacy and Security

We are committed to protecting the privacy and security of personal data entrusted to us by our customers, employees, and other stakeholders. We will comply with all applicable data privacy laws and regulations, including the California Consumer Privacy Act (CCPA) and other relevant legislation. Stakeholders must handle personal data responsibly, implement appropriate security measures, and ensure data is collected, processed, and stored in accordance with our data privacy policies.



3.4 Environmental Responsibility

Lexar is committed to conducting its business in an environmentally responsible manner. We will comply with all applicable environmental laws and regulations and strive to minimize our environmental impact through sustainable practices. Stakeholders are expected to be mindful of environmental considerations in their work.

3.5 Import/Export Controls

We will comply with all applicable import and export control laws and regulations of the United States and other relevant jurisdictions. Stakeholders involved in international business activities must ensure that all imports and exports of goods, services, and technology are conducted in accordance with these laws.



4. Respectful Workplace and Human Rights



4.1 Equal Employment Opportunity

We are an equal opportunity employer and are committed to providing equal employment opportunities to all qualified individuals without regard to race, color, religion, sex, national origin, age, disability, or any other characteristic protected by law. Our employment decisions are based on merit, qualifications, and business needs.

4.2 Anti-Harassment and Non-Discrimination

Lexar prohibits all forms of harassment and discrimination, whether verbal, physical, or visual, based on any protected characteristic. This includes

unwelcome conduct that creates a hostile, offensive, or intimidating work environment. All Stakeholders are expected to treat each other with respect and contribute to a workplace free from harassment and discrimination.

4.3 Workplace Safety and Health

We are committed to providing a safe and healthy work environment for all Stakeholders. We will comply with all applicable occupational safety and health laws and regulations and take proactive measures to prevent accidents, injuries, and illnesses. Stakeholders are responsible for following safety procedures and reporting any unsafe conditions.

4.4 Fair Labor Practices

Lexar is committed to upholding fair labor practices in accordance with applicable laws and regulations. This includes fair wages, reasonable working hours, and the prohibition of child labor and forced labor. We respect the rights of our employees and strive to maintain positive employee relations.



5. Interactions with Stakeholders

5.1 Customers

We are committed to providing high-quality products and services and building strong, long-term relationships with our customers. We will treat our customers fairly, honestly, and with respect. Our communications will be clear, accurate, and not misleading. We are dedicated to addressing customer needs and concerns promptly and effectively.

5.2 Suppliers and Vendors

We are committed to fair and ethical dealings with our suppliers and vendors. We will select our business partners based on objective criteria such as quality, price, service, and ethical practices. We expect our suppliers and vendors to adhere to ethical standards consistent with this Code. We will avoid conflicts of interest in our supplier relationships.

5.4 Communities

Lexar is committed to being a responsible member of the communities in which we operate, including San Jose, California. We will strive to contribute positively to these communities through economic development, environmental stewardship, and social responsibility initiatives, where appropriate.

5.3 Investors and Shareholders

We are committed to providing our investors and shareholders with accurate and timely information about our financial performance and business operations. We will communicate openly and honestly and strive to maximize long-term shareholder value while adhering to ethical and legal obligations.



6. Financial Integrity and Reporting

6.1 Accurate Record-Keeping

Lexar is committed to maintaining accurate and complete financial records in accordance with all applicable accounting principles and regulations. All transactions must be properly authorized, recorded, and reported. Stakeholders involved in financial reporting have a responsibility to ensure the integrity and transparency of our financial information.



6.2 Internal Controls

We maintain a system of internal controls designed to provide reasonable assurance regarding the reliability of our financial reporting and the safeguarding of our assets. Stakeholders are expected to adhere to these internal controls and report any weaknesses or deficiencies they identify.

6.3 Whistleblower Protection

Lexar is committed to protecting individuals who report suspected violations of this Code or any illegal or unethical conduct in good faith. We will not tolerate retaliation against anyone who makes such a report. Our Whistleblower Policy outlines the procedures for reporting concerns and the protections afforded to whistleblowers.

You can report concerns to your manager, Human Resources or Legal Department, or through our confidential reporting system EthicsPoint:
<https://secure.ethicspoint.com/domain/media/en/gui/96576/index.html>





7. Enforcement and Accountability

7.1 Reporting Violations

If you know of or suspect a violation of this Code, or any illegal or unethical conduct, you have a responsibility to report it promptly. You can report your concerns to your manager, Human Resources or Legal Department, or through our confidential reporting hotline/system EthicsPoint.

<https://secure.ethicspoint.com/domain/media/en/gui/96576/index.html>

All reports will be treated seriously and investigated appropriately.

7.2 Investigations

Lexar will conduct thorough and impartial investigations of all reported violations or suspected misconduct. Stakeholders are expected to cooperate fully with any investigation.

7.3 Disciplinary Actions

Violations of this Code may result in disciplinary action, up to and including termination of employment or business relationship. The specific disciplinary action will depend on the nature and severity of the violation. Legal action may also be taken where appropriate.

8. Review and Updates

This Code will be periodically reviewed and may be updated or amended as necessary to reflect changes in laws, regulations, best practices, and our business operations. The most current version of this Code will be made available to all Stakeholders.





Lexar