## **Code of Ethics - Nur Ink Innovations Ltd**

Nur Ink Innovations Ltd. ("Nur Ink" or the "Company") is committed to an honest and decent business practice, with strict adherence to ethical behavior. The underlying principle of the company's business conduct is that uncompromising adherence to the ethical code is of crucial importance for gaining the trust of its clients, suppliers, employees, and shareholders.

Complying with the rules of the ethical code is the key to the very existence of the Company as a solid and viable business, to ongoing improvement in its performance, and eventually to its success and prosperity for the benefit of all its stakeholders. The Company expects every employee to act in accordance with the code of ethics. Every employee is required to meet the highest standards of ethical behavior on the personal as well as professional levels when performing their duties. Such behavior requires the demonstration of reliability and integrity in all levels of operation and all aspects of interaction with other employees, with clients and suppliers, with shareholders and potential investors, with the public as such, and with governmental, municipal and public entities.

# **Rules of the Code of Ethics**

## A. Obeying the law

The company and its employees are obliged to observe every rule of law when maintaining its business. The company is subject, inter alia, to various laws applicable to its field of operation, labor and safety laws, tax laws, antitrust laws, environmental laws, corporate laws, and securities' laws.

As the company is a public company, registered for trading on the Tel Aviv Stock Exchange (TASE), it is bound to comply with various reporting obligations, such as periodic reports and immediate reports. Every Company employee is required to observe such laws and regulations as part of and in accordance with their position. Regardless of any lawful or regulatory obligation, given the Company's profound commitment to social responsibility, the Company had set itself the goal of becoming a role model to other companies in that regard.

### B. Regard for Employees

The fundamental rights of every employee are secured, and each employee must be treated in a dignified manner and without prejudice. Every employee is entitled to freedom of thought, religion, and opinion, so long as they do not infringe on the dignity of other employees.

The Company is obliged to provide every employee with an equal opportunity for professional advancement. The Company absolutely prohibits, and does everything in its power to prevent, any type of discrimination, including discrimination based on gender, sexual preferences, age, religion, race, sect, ethnicity, disability, marital status or political orientation and/or political affiliation.

The Company respects the right to privacy and upholds as much as possible the privacy of its employees, shareholders, clients and suppliers. The Company takes every possible step for cautious handling of personal information, its storing in the Company's various databases and preventing the distribution of any such information, in order to ensure that privacy is maintained.

The Company's employees, including the employees of the Company's contractors, must avoid any kind of blatant, disrespectful, violent or threatening behavior towards other Company employees, including sexual harassment and physical or verbal violence, and further avoid any other activity that may cause or result in an offensive, humiliating or insulting atmosphere.

Human capital is the company's most important asset. Therefore, the company places a high value on the well-being of its employees and the balance between work and personal life. Accordingly, the company advocates avoiding contacting employees regarding work matters outside of working hours, including those who have left the office premises, and this includes text messages (SMS), phone calls, and messages sent via WhatsApp or other similar applications. Nevertheless, in exceptional cases where waiting until the next working day could harm the company, the company will permit contacting relevant employees outside of working hours.

For the sake of clarity, sending an E-mail message outside of working hours does not constitute as contacting employees outside of working hours.

## C. Corruption

The Company and all its employees - without exception - undertake not to offer, give, or accept bribes, not to give or accept any illegal and/or unethical payment, and to avoid any fraudulent activity. Furthermore, the Company prohibits the use of Company funds for political purposes and/or for supporting political activity of any kind.

#### D. Conflict of Interests

When making decisions or implementing and executing Company's resolutions and policies, personal considerations must be completely avoided, and the sole guiding principle should be the good of the Company.

One must further avoid activities that may create a conflict of interest between the Company and its employees.

#### E. Decency

Meeting the Company's strategic and business goals and, as a result, its very success, depends on its ability to bring, in advance of its competitors, innovative products to the Company's target markets. However, the attainment of that goal does not justify the use of any means whatsoever.

Even when facing robust competition, Company employees must not forsake honest and decent conduct, which preserves ethical principles and fairness.

The Company, including its employees and executives, enjoys a long-standing reputation for being a decent and honest corporation and human cluster. In order to maintain that fine reputation among the Company's clientele, its suppliers, its shareholders and other companies operating in its target markets, every Company employee is obliged to act according to the following principles of conduct:

•	conflicts may arise in the company's target we must strive and act to resolve such con	s-à-vis our clients: we must act in an equal and a fair manner, including in cases where inflicts may arise in the company's target markets between various clients. In such cases a must strive and act to resolve such conflicts by pursuing an honest and fair outcome hile safeguarding the long-term interests of the Company.	

- Honesty and trust: it is absolutely forbidden to provide any party including competitors, suppliers, clients, possible investors, the press, the public or any other party with information concerning the Company that is not reliable and correct for the purpose of deceit or misrepresentation. Such information includes information about the Company's products, the Company's financial status, its business relationships, or any other aspect.
- Fair competition: it is absolutely forbidden to distribute inaccurate or misleading information or information that may slander the Company's competitors, specifically relating their stability, their financial liquidity, their proficiency, the quality of their products or their reliability. Likewise, one must not misuse any type of confidential business information and/or technological, marketing or commercial secrets of companies with which the Company competes.

### F. Personal Benefits

As part of the Company's marketing and sales operations, Company's employees are allowed, subject to prior written approval from an authorized officer of the Company, to offer its clients modest gifts such as a gift upon an upcoming holiday, invitations to events such as conferences and professional exhibitions etc.

The Company allows its employees to receive gifts as part of performing their ongoing duties, on the condition that the acceptance of the gift does not have any impact on the gift-giver's preference over other parties and on the employee's decision-making in situations involving the gift-giver. In cases of unusual gifts, or in any case of uncertainty regarding the plausibility of a specific gift - the employee must report to the Company CEO and obtain the latter's approval before accepting thereof.

### G. Use and maintenance of Company's assets

The Company possesses various and diverse assets, such as intellectual assets (for example formulations of its products and/or any other type of intellectual property), material assets, commercial assets and more. The use of the Company's assets will be done lawfully and ethically, and only for the purpose of promoting and achieving the Company's business goals. The Company's assets are its exclusive property and are intended to be used for its commercial and business activities. The Company's employees are absolutely obliged to safeguard the Company's assets and use them only in a manner that is appropriate for the promotion of such business activities.

#### H. Safeguarding the company's intellectual property and business secrets

All the Company's employees are obliged to safeguard the Company's technological and business secrets. Since its establishment, the Company has accumulated rich know-how and experience in the field of its operation - including issues, knowledge, and experience thar are unique to the Company – a uniqueness which gives the Company technological, commercial and other advantages over its competitors. The Company's business, technological and commercial secrets include various documents, patents and applications for patents, requests for support from the Innovation Authority, information stored in secure computer systems, testing equipment, production equipment, laboratory equipment, testing and production methods, information regarding suppliers and raw materials, business, technological or commercial information regarding clients and other companies with whom the Company maintains various relationships,

business and marketing plans. All these are merely examples of business and commercial secrets, and it is possible that there are other important issues that have come to the knowledge of various Company employees.

From time to time, the Company is obliged to publish information and distribute it to the public, including the capital market and investors. Such distribution and publication will be done exclusively by the Company's legal counsels and investor-relations counsels and in full coordination with the Company's management.

The Company and its employees are obliged to take every possible and necessary step to maintain and develop the intellectual property of the Company. Notwithstanding, Company employees will refrain from inflicting any kind of damage, even in principle, to the intellectual property rights of any other company, without exception.

The Company's employees will access and make use of the Company's confidential information solely for the purpose of fulfilling their duties, paying particular attention to the Company's intellectual property. In addition, all Company employees undertake not to transfer any of the Company's information to other parties while being employed by the Company and afterwards. This prohibition also applies to confidential information and intellectual property of other companies with which the Company has a confidentiality agreement and/or a commercial agreement of any kind.

## I. Use of computer systems, information, and servers

All the Company's information systems, computing and servers including portable and/or personal computers, software, and communication networks, will be used solely for the fulfillment of the employees' duties for serving the Company's needs. It is strictly prohibited to use any of these systems to access, distribute, send, retrieve, store, display or print information of any kind that can be considered harassing, threatening, defamatory, misleading, or information that can be considered as or presumed to be racist or pornographic information or reflecting abomination, or any type of information the use of which, inter alia in the ways noted above, does not conform to lawful, professional, and ethical behavior.

### J. Interacting with suppliers, service providers and subcontractors

The Company and its employees will interact exclusively with suppliers, service providers and/or subcontractors who operate, practice, who avoid corrupt practices of any kind and who adhere to ethical behavior and manage their business with integrity, honesty, decency, and commercial and business fairness, in accordance with every applicable rule of law.

### K. Transactions in securities, options and/or shares of the company; Use of inside information

As Nur InK Innovations Ltd. is a public company whose shares are held by the public and are listed for trading on the Tel Aviv Stock Exchange (TASE), the Company's employees are strictly prohibited from trading (buying and/or selling) the Company's securities using and/or utilizing information that can be considered inside information as well as making any use of such

information. For the sake of clarification, inside information is any information that has not been officially published to the public by the Company.

In any case of misunderstanding or request for specific clarification, the employee interested in trading the securities and/or stock options of the Company must contact the legal counsel, the CEO, or the VP business development of the Company.

## L. Private contraction with service providers, suppliers, and clients

All Company employees are strictly prohibited from entering into contracts with suppliers, service providers and/or clients who maintain some kind of working relationship with the Company and to privately purchase products from any of them or to receive any services from any of them without obtaining prior written approval from the Company's management.

All company employees are prohibited from interacting in any way with a company/companies that compete with the Company, as well as with any Company client, service provider or supplier, without obtaining prior written approval from the Company's management.

### M. Executive – Employee relations

Every employee must make sure to report to his/her superior of any irregular act that is to be carried out during working hours, such as exiting work for the purpose of private arrangements.

- Any type of business relationship between a manager or supervisor and an employee is absolutely prohibited, to prevent any possibility of damage to the labor relations therebetween. It is absolutely forbidden for a manager or supervisor to receive, directly or indirectly, any kind of benefit from an employee under its supervision or from any other employee in the Company.

Maintaining personal relationships (that are not friendly relationships) between a manager and an employee is absolutely prohibited.

#### N. Prevention of sexual harassment

The Company attributes utmost importance to the issue of preventing sexual harassment of any kind. Hence, the Company published a separate and dedicated procedure for this important issue.

### O. Safety at work

The Company has set the goal of maintaining strict and uncompromising observance of all safety rules as a supreme rule pertaining to all its ongoing operations, in compliance with all applicable laws and/or regulations. Furthermore, the Company will establish, by need, rules for promoting safety at work that are not included in the law or in any regulation. Parts of the Company's premises

are operational areas where tools and/or equipment operate or are operated which require special attention to safety rules.

According to the labor inspection law, a work safety officer was appointed in the Company and a safety committee was also appointed, which convenes at least once a quarter. This committee will consist of Company employees and managers. All employees are required to report any safety hazard to the supervisor of safety at work.

## P. Proficiency and employee responsibility

Every Company employee will perform any act with utmost proficiency, high-quality and safe manner, for themselves and those around them.

## Q. Environmental Responsibility

The Company attributes substantial importance to environmental issues. The Company undertakes to comply rigorously with all the required terms and conditions in the applicable laws, regulations, and standards, in order to preserve the environment to the best of its ability.

In order to operate in an environmentally friendly manner, all Company employees are expected to demonstrate enhanced sensitivity to the issue and do as much as possible to preserve the environment and prevent hazards of any kind.

The Company undertakes to minimize its negative impact and the negative Impact of its products on the environment by sorting and reducing waste, recycling waste and garbage, reducing vehicle emissions, preventing water wastage, reducing energy consumption and developing environmentally friendly products that meet strict industrial standards such as GOTS, Eco-Passport and more.

### R. Implementation of the Code of Ethics policy

The present document and everything stated therein is binding and applies to all Nur InK Innovations' employees, in all aspects of their activity in the company, including decision-making concerning clients, service providers, suppliers, subcontractors, investments, and in any matter related to the fulfillment of their duties in the Company.

- This document will be distributed to all Company employees
- New employees will receive a copy of this document upon their recruitment
- This document will be attached as an appendix to the employment agreements with newly recruited employees
- This document will be attached as an appendix to every engagement agreement of the Company with service providers, suppliers and consultants

- All Company employees bear responsibility for complying with everything stated in this document and acting accordingly. Any question and/or clarification regarding the meaning of any topic in this document can be addressed to the direct manager or directly to the Company's CEO.
- All Company managers/executives are obliged to make sure that all employees under their supervision have received this document, understand its content, are aware of the Company's Code of Ethics and comply therewith. Company managers/executives are responsible for informing and providing guidance regarding the Code of Ethics to all Company employees, as well as for conducting refreshening sessions on the subject at least twice a year.
- A manager/executive who gains knowledge of a violation of the Company's Code of Ethics by any of his/her subordinate employees or by any other Company employee, will immediately report thereof to the Company CEO. It must be made clear to all employees and managers/executives of the Company that a violation of the Company's Code of Ethics may result in disciplinary measures being taken against the violating employee, including dismissal, and/or legal measures being taken against him/her if necessary and according to the matter at hand.

### S. Handling of complaints concerning violation of the Company's Code of Ethics

Any violation of the Code of Ethics must be reported to the employee's direct manager, to any of the Company's managers/executives and/or to the Company's CEO. Any report regarding the violation of the Company's Code of Ethics will be investigated and examined thoroughly, seriously and with the appropriate sensitivity, while maintaining absolute confidentiality. The Company, its employees and managers/executives will not avenge themselves or "even the score" in any way whatsoever, such as dismissal, suspension, threat, harassment, discrimination or taking any disciplinary measures, against an employee who reported a violation of the Code of Ethics by another employee or manager/executive in the Company. However, the Company may take disciplinary measures against an employee who knowingly, and not in good faith, reported a false or incorrect report.