

CODE OF CONDUCT AND ETHICS POLICY

Team Onterris,

When we formalized our principles, we collectively articulated our shared emphasis on quality and integrity with all we do. Our conduct not only reflects on us as individuals, but it also shapes how our team is perceived by those with whom we interact. Each of you is Onterris, and you influence our collective reputation, our brand and, therefore, the future of all who are a part of it.

It is in this spirit that we created our Code of Conduct and Ethics Policy. This Policy formalizes what we already hold sacrosanct: our integrity, our sound judgment, our proper conduct and our adherence to laws. It also reflects the Values that guide us: acting with ambition, relying on each other, leading with integrity, and putting people's safety above all else.

Just as importantly, this Policy comes to life through the Behaviors we demonstrate each day. We commit to transparency, act with care, listen first and celebrate our individuality. These Behaviors help us live our Code of Conduct and Ethics in practical, meaningful ways across our work, our decisions and our relationships.

This is how we create trust with our clients, our team members and our community who rely on us to serve as model citizens and to provide accurate and quality environmental services.

Please review this Policy. Share it, discuss it and abide by it, for it reflects who we are, who we want to be and how we choose to show up for one another, our clients and our communities.

Regards,

A handwritten signature in black ink, appearing to read "Vijay Manthripragada".

Vijay Manthripragada, CEO

Governing Principles

- Apply our Code of Conduct and Ethics Policy in all business dealings
- Act with integrity in all of your Onterris relations and activities
- Adhere to all applicable laws and regulations governing our business

Expectations

Onterris, Inc. (including its subsidiaries, the “Company” or “Onterris”) is dedicated to the highest ethical standards and is committed to diligently following both the letter and the spirit of the laws and regulations applicable to the conduct of its business. The Company expects that all employees will follow the guidelines set forth in this Policy and all applicable laws. Although the Policy is specifically written to describe actions, expectations and governing rules for our employees, we also expect that all of our representatives, agents and affiliates will adhere to the principles and policies set forth herein.

In order to maintain the highest standards of ethical conduct, strict adherence is required. However, no code or policy can anticipate every situation that may arise. Accordingly, this Policy is intended to serve as a source of guiding principles. If you have any questions about particular circumstances or the Policy generally, you are encouraged to reach out to the appropriate person. If you are aware of any potential violations of this Policy, you have a duty to report it to the Company. All communications under the Policy, including the reporting of potential violations, may be done anonymously, and the Company will not tolerate retaliation against any employee reporting a valid concern or violation. The Company values your feedback in ensuring that this Policy, together with all applicable policies of the Company, including our Employee Handbook, governs the Company and the actions of all of its employees, representatives, agents and affiliates. Please refer to the “**Implementation and Compliance**” section of this Policy for further information.

1. Operate Professionally, Independently and Impartially

We must ensure that our independence, impartiality and professionalism are never compromised. We do not tolerate any influence with respect to deviations from our impartial methods and procedures or accurate reporting of results or findings. All testing results and reporting shall be reported accurately, completely and in good faith and the advice we give and services we provide shall be independent and unbiased.

All quality manuals, policies and procedures must be strictly complied with at all times to ensure that our work product is always defensible, reliable and accurate.

Each employee is responsible for the propriety and consequences of his, her or their own actions. No one will be excused for his, her or their misconduct simply because it is directed or requested by someone else. Nor will anyone be excused for ignoring or condoning illegal or unethical conduct engaged in by others.

2. Ensure that Documents, Records, Public Statements and Filings are Complete and Accurate

Employees are expected to maintain books and records in appropriate detail to reflect the Company's transactions accurately, fairly and completely. The Company's policy of accurate, fair and complete recordkeeping applies to all Company records. Documentation relating to a transaction should fully and accurately describe the nature of the transaction.

Employees must ensure that information and documents they generate and distribute, whether internally or externally, and by any means, contain reliable and complete information. This applies to all functions of the Company, including documents and records prepared for clients or other third parties, documents in respect of finance, legal, tax, health and safety, and human resources, as well as documents, records and reports provided to regulatory agencies. The use or making of false statements or making of false entries in Company records is strictly prohibited, whether to influence individuals or companies with whom we do business or to the government or otherwise, and can result in civil or criminal liability.

All financial and accounting information must be duly and correctly recorded in the Company's books and accounts and should be complete, accurate and truthful at all times. All entries must be supported by the appropriate documentation and must be recorded in good faith.

As a public company, the Company files financial statements and other information with the U.S. Securities and Exchange Commission ("SEC"). Employees are responsible for the accurate and complete reporting of financial information within their respective areas of responsibility and for the timely notification to senior management of financial and non-financial information that may be material to the Company. Reports and other documents that the Company files with or submits to the SEC, and other public communications, should contain full, fair, accurate, timely and understandable disclosure.

The Company's business records must be maintained for the periods in accordance with the Company's document retention policies, as they may be amended from time to time. Records may be destroyed only at the expiration of the pertinent period. In no case may documents involved in a pending or threatened litigation or government inquiry or under subpoena or other information request, be discarded or destroyed, regardless of the periods specified in the applicable policy. In addition, no one should ever destroy, alter, or conceal, with an improper purpose, any record or otherwise impede any official proceeding, either personally, in conjunction with, or by attempting to influence, another person.

3. Respect of and Compliance with Laws and Regulations

It is the Company's policy to comply with all laws, rules, regulations and Company policies. Many of the Company's activities are subject to complex and changing laws. Ignorance of the law is not, in general, a defense. Accordingly, employees must diligently ensure that they are aware of, and that their conduct cannot be interpreted as being in contravention of, laws governing the affairs of the

Company. Each employee is responsible for understanding and complying with the laws and regulations that are applicable to his, her or their job responsibilities, including anti-competition and insider trading laws. In the event of uncertainty, employees should proactively solicit advice from the Company to ensure adherence to all applicable laws and regulations.

We are committed to competing fairly and in compliance with antitrust and other applicable laws, regulations, decrees and orders. The law promotes fair and open competition and prohibits practices that restrict competition. Illegal anti-competitive behavior includes price fixing and/or reaching agreements with our competitors relating to contracts and projects for which we compete. Onterris must never collude with other parties on price or terms, nor should we make agreements or arrangements with competitors to allocate clients or markets, or take any other actions to manipulate bidding processes. Severe civil and criminal sanctions can result from violations of competition or antitrust laws.

Federal and state laws prohibit buying, selling or making other transfers of securities by persons who have material nonpublic information about a company. Even if not shareholders, these laws prohibit persons with this information from disclosing it to others who may trade. Employees may not trade in the securities of any company when they are aware of material nonpublic information about that company. This policy against “insider trading” applies to trading in Company securities, as well as to trading in the securities of other companies, such as the Company’s clients, distributors, suppliers and companies with which the Company may be negotiating a major transaction. Transactions in Company securities are governed by the Company’s Insider Trading Policy.

Any potential issues that may lead to legal or regulatory compliance violations should be escalated appropriately.

4. Avoid Conflicts of Interest and Make Appropriate Disclosures

Employees should avoid conflicts of interest, both real and perceived. Even the appearance of impropriety can be very damaging to the Company’s reputation. A conflict of interest can arise when a person’s personal or business interests conflict with – or appear to conflict with – those of the Company. A person’s personal or business interests include the interests of an immediate family member or an organization with which the person or an immediate family member has a significant relationship. Prohibited conflicts of interest may also arise from the receipt of an improper personal benefit as a result of a person’s position with or relationship to the Company. You have a duty to try to avoid all such situations, even if you think your judgment is not influenced. Your immediate family includes your spouse, parents, stepparents, children, stepchildren, siblings, mother- and father-in-law, sons- and daughters-in-law, brothers and sisters-in-law, and anyone (other than a domestic employee or tenant) who shares your home.

This Policy does not attempt to describe all possible conflicts of interest which could develop. Some of the more common conflicts from which you should refrain, however, include:

- *Relationship of Company with third parties.* You may not engage in any conduct or activities that are inconsistent with the Company’s best interests or that disrupt or impair the Company’s

relationship with any person or entity with which the Company has or proposes to enter into a business or contractual relationship.

- *Compensation from non-Company sources.* You may not accept compensation (in any form) for services performed for the Company from any source other than the Company.
- *Gifts.* Neither you nor members of your immediate family may accept gifts where a gift is being made in order to influence your actions as an employee of the Company, or where acceptance of a gift could create the appearance of a conflict of interest. See the “**Avoid Making or Accepting Bribes or Gratuities**” section of this Policy.

All employees must remain independent and have an obligation to report to their supervisor and the Legal Department any commitments, ties, or situations which involve, or may reasonably be expected to create, a conflict of interest.

If you are aware of any conflicts or potential conflicts, they should be reported immediately in accordance with the **Implementation and Compliance** section hereof. Conflicts of interest are not necessarily a violation of the Company’s policy, but failing to promptly disclose a conflict or potential conflict of which you are aware is a violation.

5. Engage in Fair Dealing

Always deal fairly and honestly with all employees, clients, suppliers, competitors, other business partners and regulators and authorities. You should never take unfair advantage of anyone through unfair practices, including, but not limited to, misrepresentation of material facts, manipulation, concealment or abuse of privileged or confidential information. These parties should also be treated with courtesy and respect at all times. Competitive information (including pricing, contract terms and other relevant information) should never be shared with competitors. See the “**Maintain Confidentiality**” section of this Policy.

See the “**Respect of and Compliance with Laws, Regulations and Authorities**” section of this Policy.

6. Avoid Making or Accepting Bribes or Gratuities

Directly or indirectly making or accepting bribes or gratuities in furtherance of business or personal purposes undermines our principle of acting with integrity and transparency and is in violation of Company policy and can be a violation of law.

This restriction applies to the offering, promising, soliciting or accepting, whether directly or indirectly, of a bribe, payment, gift or favor or other benefit, to induce, influence or reward any other person (including past, present or prospective partners, joint venturers, clients, suppliers, vendors, competitors or employees of the Company) in the course of performance of duties for the Company, on behalf of the Company or for the benefit of the Company, including facilitating payments to expedite routine administrative actions. This also applies to bribes, payments, gifts, favors or benefits that give the appearance of a reward or obligation relating to any aspect of the Company’s business.

A prohibited gift or benefit means anything of other than nominal value that could reasonably be perceived as having an improper influence on the conduct of an employee of the Company. Examples include, but are not limited to, any gift, gratuity, fee, award, prize, honorarium, credit, favor, service, appointment, bequest, legacy, entertainment, travel, hospitality or any discount or business opportunity which is not available to the public.

The Company recognizes certain circumstances under which it is lawful and permissible for an employee to accept a gift or personal benefit from clients, vendors or others having some relationship with the Company or under which it is permissible to furnish modest gifts, favors and entertainment to persons other than public officials. However, employees must have the approval of both the Company's Chief Financial Officer and General Counsel before conveying anything of value to a public official, such as treating the official to a meal, and must always act in compliance with all applicable laws and this Policy. Generally, the factors determining acceptability are the value of the gift or benefit and the nature of the relationship with the Company and the recipient. See the **"Engage Appropriately with Public Officials and Political Activities"** section of this Policy.

In some situations, the refusal or return of a gift may cause offense which may damage a business relationship. Employees must notify their manager if a gift is received in the course of employment, or may be perceived to be in the course of employment, whether from a client, supplier, vendor or other third party. The manager will consult with the appropriate Company official (e.g., Legal, Human Resources) before determining how best to respond to the gift or offer of the gift.

7. Engage Appropriately with Public Officials; Political Activities

All dealings between employees of the Company and public officials are to be conducted in a manner that will not compromise the integrity or impugn the reputation of any public official or the Company or its affiliates. Even the appearance of impropriety in dealing with public officials can be damaging. Any participation, directly or indirectly, in any bribes, kickbacks, illegal gratuities, indirect contributions or similar payments is expressly forbidden, whether or not they might further the business interest of the Company. It is important for all employees, affiliates, representatives and partners of Onterris to understand that Onterris has a zero-tolerance policy for such illegal behavior and actions in all business dealings, in every country around the world, with both governments and the private sector. Maintenance of a high standard of integrity is of the utmost importance to the Company.

The Company is committed to complying with the principles related to these matters embedded in regulations, including the Foreign Corrupt Practices Act, which prohibit the payment of any money or the giving of anything of value directly or indirectly to an official, political party, party official or candidate for political office for the purpose of influencing any act or decision of an official or inducing an official to use his, her or their influence with the government to affect or influence any act or decision of such government.

Because the furnishing, on behalf of the Company, of even an inexpensive gift or a modest entertainment or benefit to a public official may be open to the interpretation that it was furnished illegally to secure the use of the individual's influence as a public official, no such gift, entertainment

or benefit may be furnished by an employee unless the employee is authorized to do so by the Board of Directors, Chief Executive Officer or General Counsel of the Company and the employee complies with any conditions prescribed by such Company officer or the Board.

Both federal and state law provide limitations on corporate involvement in the political process. Without prior authorization from the Company's General Counsel and Chief Executive Officer, employees may not devote time during working hours to any campaign or for a candidate or political party, nor may they permit any campaign or candidate to use any of the Company's name, facilities or property. In addition, corporate funds, goods and services should not be used for politically related activities unless expressly authorized by the Chief Executive Officer and General Counsel. Employees should also be aware that actions taken outside of work hours during personal time and not seemingly tied to a person's position with Onterris can be imputed on the Company. Therefore, while we welcome our employees' political engagement, they should be mindful of how any political activities during personal time, including social media posts, may be attributed to Onterris.

8. Appropriately Use and Obtain Company Funds and Property

Employees must approach all matters concerning funds and property held by the Company with care, diligence and honesty. The Company will not tolerate any scheme to wrongfully obtain such funds or property, whether through theft, embezzlement, fraud, false pretenses, false statements or otherwise. Unless otherwise agreed to in writing by the Chief Financial Officer, the use of Company equipment or property for personal or non-Company related use is prohibited and, in some instances, will be considered theft.

In addition, misuse of Company information, assets, resources or influence is prohibited. Employees may not (i) use Company property or information or their position with the Company for personal gain, (ii) take for themselves personally any opportunities related to the Company's business that are discovered through the use of Company property or information or their position with the Company or (iii) compete with the Company.

9. Maintain Confidentiality

Our clients, employees and other third parties expect that we hold in strict confidence their business and personal information. Unauthorized disclosure or dissemination of business or personal information may be a breach of contract and, in some circumstances, can result in criminal charges.

All information received in the course of business must be treated as, and must remain, strictly confidential. Unless expressly authorized by the Company's Legal Department, confidential information should not be (i) discussed with third parties, (ii) disclosed to unauthorized recipients, (iii) discussed in public places or (iv) otherwise released or made public.

Adequate security measures should always be implemented to ensure that confidential information is accessible to authorized persons only, is used only for its intended purpose(s) and is stored and disposed of appropriately and securely. All employees and contractors of Onterris are also contractually bound to confidentiality obligations and must comply with the terms of their written

agreements. See the “**Protect Against Cyber Risks to Onterris Systems and Information**” section of this Policy.

Confidential information includes all non-public information entrusted to or obtained by an employee as a result of the person’s position or relationship with the Company, whether the information relates to the Company or a third party. Confidential information includes, but is not limited to, non-public information that might be of use to competitors or harmful to the Company or its clients if disclosed, such as: information regarding research and development, inventions and innovations; marketing and product information; client and vendor information (including, but not limited to financials, lists, documents, files, purchases, preferences and account history); pricing, margins and pricing strategies and policies; sales data for any employee, product, client or territory; financial information of the Company; the terms, conditions and structures of the Company’s contracts; and information pertaining to the Company’s methods of operation, processes, strategies and techniques. Confidential information also includes personal information about the Company’s employees, clients, donors, vendors, suppliers, service providers or employees of such third parties, including but not limited to, data that reveals identity, phone, fax or cell numbers, email address, address, post office box or location, banking information, credit card numbers, financial history, credit history and rating, personal health information, information relating to child support, alimony and/or garnishments and other similar information.

Any media inquiries, subpoenas or other requests for confidential information should be referred to the Company’s Legal Department.

10. Protect Intellectual Property

Onterris intellectual property should be protected at all times. This includes technical, commercial and financial information, software, methodologies, inventions, methods, databases and know-how of the Company. Such information should be used appropriately for permitted business purposes only and should not be shared or disclosed outside of the persons authorized to use or receive such information. See the “**Appropriately Use and Obtain Company Funds and Property**” section of this Policy.

Onterris respects valid intellectual property rights of others and avoids unauthorized use of intellectual property that belongs to third parties. We also aggressively protect our own intellectual property and enforce our rights against those who use or take such information without authorization or legal rights.

11. Protect Against Cyber Risks to Onterris Systems and Information

Adequate measures should always be taken to protect against cyber risks and to respect privacy rights. All confidential and other personal and/or identifying information should be properly collected, handled and protected in compliance with applicable laws and with Company information technology policies included in the Employee Handbook. In order to prevent unauthorized access or loss of Company information, all devices should be secured with strong passwords that should not be shared

with others. Only Company-authorized devices should be used for storage, transmission and backup of Company information and non-authorized devices, software or personal email addresses should never be used for Company business. In addition, physical copies and storage areas should always be secured.

Notify the Company's Information Technology department immediately if you suspect any of your electronic devices containing Company information have been compromised.

12. Non-Discrimination; Engage in Fair Employment Practices

Our people are our strongest assets, and we are committed to treating everyone fairly and with respect. Employment decisions are based on merit and qualifications and should be made without consideration of a candidate's age, disability, race, color, religion, national origin, sex, sexual orientation, gender identity, veteran status or other characteristic protected by law.

Everyone is entitled to a workplace free from discrimination and harassment of any kind and should be treated with respect at all times. Any observations or experiences in violation of Company policy should be reported in accordance with the "**Implementation and Compliance**" section of this Policy.

Privacy rights of employees should always be respected and personal data should always be used, maintained and transferred in accordance with applicable laws and regulations. See the "**Maintain Confidentiality**" section of this Policy.

13. Environmental, Health and Safety Matters

Safety is of utmost importance to us. All employees should strictly adhere to the Company's environmental, health and safety policies and practices and to applicable environmental, health and safety laws to ensure workplace safety and to prevent injuries.

You should be alert and aware of any environmental and safety hazards in your workplace. Any unsafe or improper practices, environments or operations should be immediately remedied and disclosed to the appropriate supervisors to ensure compliance with Company policies and laws.

14. External Communications

The Company strives to maintain open, honest and consistent communications. In order to facilitate the accuracy and appropriateness of all information publicly disclosed, only authorized individuals are permitted to speak with or respond to inquiries from the media, shareholders, the investment community (such as securities analysts and investment advisors) and government entities on behalf of the Company. If an employee is contacted by a member of the media, a shareholder or a member of the investment community, the employee should decline to comment and should immediately refer all inquiries to the Company's Marketing Department. Inquiries from a government entity should be referred to the Company's Legal Department.

The Company has adopted this policy in part to promote compliance with Regulation FD (Fair Disclosure). Regulation FD is a rule under the federal securities laws that prohibits companies from disclosing material nonpublic information to shareholders where it is reasonable to expect that they will trade on the information, and to the investment community without also disclosing the information to the public. To promote compliance with Regulation FD, the Company permits only designated spokespersons to discuss the Company with the media, shareholders and the investment community. More information can be found regarding these and related issues in the Company's Guidelines for Public Disclosures and Communications with the Investment Community.

Implementation, Compliance, Waivers and Reporting Violations

All employees, representatives and agents of Onterris are expected to read, understand and comply with this Policy. You should be proactive in following and monitoring compliance with the guidelines set forth herein, and you are encouraged to raise questions and promptly report any observed or threatened violations.

Unless a particular provision of this Policy directs otherwise, for any questions or concerns regarding implementation or compliance with this Policy, please contact the Legal Department.

An employee who becomes aware of any conduct that he or she believes may violate this Code or law is expected to promptly report it to the Executive Vice President, Human Resources, the General Counsel, or the Vice President of Internal Audit.

Officers should contact the General Counsel, Vice President of Internal Audit or the Chair of the Audit Committee if they have questions about the Code or wish to report potential misconduct.

Employees may report complaints or concerns regarding accounting, internal accounting controls, auditing or federal securities law matters, or misconduct involving a member of the Company's management to the Audit Committee, by emailing whistleblower@Onterris.com or by contacting the Company's General Counsel or the Company's Vice President of Internal Audit.

Alternatively, the Company has implemented Navex as a resource to report any concerns relating to violations of this Policy and/or to solicit guidance relating to the policies set forth herein. Comments, questions and concerns may be submitted anonymously by phone (844-319-4551) or via the Ethics Helpline website (www.onterris.ethicspoint.com).

Reports of potential misconduct may be made anonymously and confidentially, although individuals are encouraged to identify themselves to facilitate follow-up and investigation. Every effort will be made to protect the reporting individual's identity. In some instances, however, it may be impossible to keep the person's identity confidential because of the demands of conducting a thorough investigation or because of legal requirements.

The Company will treat each report of potential misconduct seriously and no retaliation will be taken or tolerated against anyone for reporting or supplying information about a valid concern. Upon receiving a report, the Company will promptly review the report and conduct a thorough investigation.

When a report is received, with the exception of those submitted anonymously, the reporting individual will receive a confirmation of receipt, and another notification when the investigation is closed. It is the obligation of all employees to cooperate with an investigation, and employees are encouraged to provide all known facts and as many details as possible to assist with the investigation. No employee will be subject to discrimination, harassment or retaliation of any kind for assisting in an investigation of a report.

Notwithstanding the foregoing and for the avoidance of doubt, nothing contained in this Policy, nor in any agreement signed by you, prohibits you from voluntarily communicating with, reporting concerns to, filing a charge or complaint with, making lawful disclosures to, providing documents or other information to or participating in an investigation or hearing conducted by the Equal Employment Opportunity Commission, National Labor Relations Board, SEC or any other federal, state or local agency charged with the enforcement of any laws regarding possible violations of law or regulations or from recovering whistleblower awards from the SEC or any other agency or from exercising your rights under the National Labor Relations Act.

Waivers of certain provisions of the Policy will be granted only in exceptional circumstances. Employees who believe that a situation may warrant a waiver should contact the Legal Department. Any waivers of provisions of the Policy for officers of the Company will be made via request to, and approved only by, the Board of Directors of the Company or a committee of the Board of Directors and will be disclosed in accordance with applicable law.

Any person subject to this Policy who fails to comply with it may be subject to appropriate disciplinary measures which may include the termination of his, her or their employment with the Company. The Company may also be obligated to bring known violations of the law to the attention of appropriate enforcement authorities.

This Policy is not an employment contract between the Company and any of its employees and does not alter the Company's current employment relationship with any employee.

Updated April 17, 2026