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MESSAGE FROM OUR CEO

We believe in respect, integrity, and unity at Dominion. We are forward-thinking, innovative, and proactive. Most of all, we are responsible. We will never compromise our ethics or act in a way that lacks integrity just to attain our financial goals. We take calculated risks within the relevant legal framework and adhere to rules based on responsible judgement. Ultimately, we are committed to acting in line with the highest ethical and legal standards, operating in full compliance with the relevant laws in each jurisdiction.

Dominion's Code of Ethics and Business Conduct helps us maintain our values, setting forth principles which we must follow while working throughout each day's proceedings

We are also aware that our ability to thrive depends on our employees, officers, directors and partners, with whom we have built our reputation for excellence.

If we want to continue embracing growth and success, it is important that every one of us reads, understands, and abides by this Code. Adhering to it will not only establish and maintain our reputation for organizational integrity, but also encourage better business practices and healthy working relationships, two pillars that Dominion's future will be built on.

Sincerely,

Tim Nelson

Chief Executive Officer

INTRODUCTION

At Dominion, we believe that ethical behavior, business integrity, and compliance with the law are essential to our success. This Code of Ethics and Business Conduct sets forth our expectations for how our employees, directors, and officers must conduct themselves. We expect all Dominion employees to read and understand this Code, to think about the principles set out in herein, and to incorporate them into everything they do at the Company. We also expect third parties who conduct business with or on behalf of Dominion to uphold these same principles.

The purpose of this Code of Ethics and Business Conduct is to promote honest, ethical and lawful conduct among all employees, officers and directors of the company. We aim to provide full, fair, accurate, timely and transparent disclosure in accordance with applicable laws, rules and regulations. This Code has also been designed to help you understand Dominion's standards of legal and ethical business practices, and to be aware of ethical and legal issues you may encounter while carrying out your responsibilities at Dominion.

If you have questions about this Code of Ethics and Business Conduct, or any ethical issues that may arise during your time at Dominion, please contact the Compliance Department for assistance at compliance@dominion-cs.com. The Code doesn't offer an answer to every situation, but we're here to help ensure that you make the right decisions for Dominion and yourselves.

STATEMENT OF CORE VALUES

We are One Dominion. We are a global team with a single mission: To translate complicated financial speak into products and services that anybody can understand. At Dominion,

We want to work with great people.

We are open, honest, and constructive.

We earn customer trust, loyalty and respect every day.

We don't take success for granted.

We think big.

We take intelligent risks.

We reject as many projects as necessary, to accept those that are meaningful to us.

We observe, reinvent, and simplify.

We move fast.

We believe that sustainable long-term growth and profitability are key to our success.

GENERAL PRINCIPLES

You are always expected to:

- Understand that this Code and the law apply to your work. Violating this Code, other internal policies or the law is never justifiable, no matter what corporate or individual target or goal you are trying to achieve
- Be honest and ethical, avoiding any conflicts of interest between personal and professional interests. By being transparent and upfront about any potential conflicts, we can maintain a high level of integrity in our work
- Provide accurate and complete information that lines up with the Company's periodic disclosure reports (which are filed with regulators) in all communications, private or public
- Comply with all relevant laws, regulations, and company policies. We are each personally accountable for our adherence to this code. Ignorance of the law or company policy is not an excuse for non-compliance

COMPLIANCE WITH THE LAW

Dominion is committed to acting with integrity at all times. We comply with all relevant rules, regulations, and legal requirements in all jurisdictions where we do business. We are all obligated to understand the company policies, laws, rules and regulations that apply to our roles within the Company. If you do not know whether an action is permitted by law or Company policy, you should speak to the relevant subject matter expert.

We are all responsible for preventing infringements of the law. We are also responsible for speaking up if we see possible infringements. The Company refuses to condone activities by employees, officers, directors, or business partners whenever they are deemed to be illegal or unethical. This includes: payments for illegal acts, indirect contributions, kickbacks, and bribery. Our activities are subject to close public scrutiny, and it is imperative that we conduct ourselves in-line with the relevant laws, regulations, and Company policies governing the Company operations.

Fair Dealing

Dominion expects its employees to treat everyone fairly and respectfully. This includes customers, suppliers, business partners, competitors, and fellow employees. Dominion employees must not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of facts, or any other unfair-dealing practice. We respect the confidentiality and privacy of our vendors, suppliers and customers. Information pertaining to Dominion's suppliers, vendors, customers, competitors and employees should never be used in an unethical manner, but must always be used in compliance with the law. Information must never be obtained through theft, illegal entry, blackmail, or electronic eavesdropping, or through misrepresenting your identity or affiliation (or lack of affiliation) with

the Company. Finally, you must respect and safeguard any confidential or proprietary information shared with the Company in accordance with all confidentiality restrictions that cover it.

Antitrust Compliance

Antitrust laws that prohibit agreements among companies that fix prices, divide markets, limit production, or interfere with free marketplace competition in some other way, are common in many countries. Antitrust and trade regulation issues can be complex. Whether an action unreasonably restrains trade or is improper in some other way can be hard to determine, and will depend on a number of other factors, including the structure of the market. Whenever you have any doubt about the legality of a communication, action, arrangement, or transaction, please contact the Compliance Department for guidance.

Anti-Bribery and Anti-Corruption Policies

Dominion complies with all relevant anti-corruption laws and regulations. As a result, employees and third parties working on Dominion's behalf are barred from giving, paying, promising, offering, or authorizing the payment of anything of value (such as money gifts, travel, entertainment, etc.) directly or indirectly through another party to any other party, including any government official, in an effort to convince that party to aid anyone (including the Company and its employees) to secure an unfair advantage (e.g., preferential treatment in securing a contract, favorable immigration or customs treatment, lower tax assessment, etc.).

Employees and third parties working on Dominion's behalf are also prohibited from soliciting or receiving any form of bribe or kickback in connection with Dominion's business. Personal or Dominion resources may not be used to circumvent these requirements.

In addition to prohibiting bribery by companies and individuals directly, anti-bribery laws also bar bribery through third parties. As a result, Dominion could be criminally liable for the anti-bribery law infringements by a third party. Dominion must ensure that it only works with ethical third parties in an effort to mitigate this risk. Before hiring any consultants, agents, independent contractors, or other representatives to act on Dominion's behalf, you must consult the Company's Use of Third Parties procedures. These insist that an appropriate level of due diligence be conducted on third parties the Company engages with. This process includes collecting and evaluating information about each third party's qualifications, reputation, associations, and any applicable regulatory status. In addition to this, further amounts of due diligence vary depending on the risks inherent in the engagement, the type of third party involved, the services they are engaged to provide and the presence of any "red flags."

Employees found to be giving, paying, promising, offering, authorizing, receiving, accepting or condoning a bribe, kickback, or other unlawful benefit (or attempting to initiate such activities) will be penalised to an appropriate degree. Penalties imposed could include the termination of an employment contract and/or criminal proceedings.

Gift, Entertainment, and Business Courtesies

Dominion is committed to only pursuing business opportunities where we can compete based on the quality of our products and services. We should avoid any actions that could give the impression that we sought, received or gave favourable treatment to outside entities in exchange for gifts, entertainment or favours. As a result, employees should not offer or accept entertainment, gifts, or personal favours that could be construed as influencing business decisions in favour of entities Dominion has, or is likely to have, business dealings with. In the same way, employees should refuse any other types of preferential treatment under similar circumstances. This is because their association with the Company might be perceived as placing the Company under an obligation to respond in kind.

Anti-Money Laundering

Employees should avoid business relationships with customers and/or other third parties that could be laundering money. “Money laundering” is defined as trying to disguise funds acquired through illegal activities as being acquired through some other, legal, activity. Employees must ensure they are conducting business with reputable customers, for legitimate business purposes, with legitimate funds. They should be on the look out for “red flags” coming from third parties, like requests for cash payments, payments to an account in a different name, or other suspicious payment terms. If you think a Dominion service or product is being used in an attempt to launder funds, contact our Compliance Department.

For a specific, detailed guide dealing with this subject, please refer to Dominion’s Anti-Money Laundering And Countering Terrorist Financing Manual.

Trade Compliance

Many governments have implemented trade restrictions that restrict the export and import of specific commodities and technologies, as well as commerce and other connections with countries or individuals who may be sanctioned for their involvement in illegal activities such as terrorism and drug trafficking. Dominion follows all legal rules governing our cross-border operations, including trade compliance regulations. When dealing with international trade issues, always consult the Compliance Department first, especially before sending encryption technology or other sophisticated software or restricted items to a foreign jurisdiction or commencing any transaction involving a sanctioned country or a prohibited party. Any request to join in a boycott of other people, firms, or countries, as well as any request to provide information about the Company’s relationships with any boycotted individual or country, should be reported to the Compliance Department.

CONFLICTS OF INTEREST

Employees are expected to carry out their responsibilities with integrity, honesty, and in the best interests of the company. Any relationship or behaviour that can affect, or even appear to affect, your capacity to make objective and fair decisions while performing your job must be avoided.

Even a seemingly insignificant conflict of interest can harm Dominion's business and reputation.

A circumstance where an observer would think that an employee's judgement was influenced by something other than the Company's best interests is known as an apparent conflict of interest. If you have a personal or financial tie with a Company vendor, for example, it may look to others like you are favouring the vendor - even if you are not.

Furthermore, you may find yourself in situations when the Company's business decisions collide with your own personal or family interests. Employees are not permitted to utilise their positions or the knowledge gained as a result of their positions for personal or private gain. When the chance arises, each employee owes it to the Company to advance the Company's legitimate interests. You must never utilise Company property or information for personal advantage, or take any opportunity uncovered through your position with the Company for yourself. Regardless of the circumstances, if an employee suspects that a course of action they have taken, are currently taking, or are considering taking could put them in a conflict of interest with the Company, they should immediately inform their supervisor, manager, or the Compliance Department.

For specific, detailed guidance, please refer to Dominion's Conflicts of Interest Policy

OUTSIDE ACTIVITIES, EMPLOYMENT, AND DIRECTORSHIPS

Maintaining the Company's good public relations is a shared duty among all personnel. Their willingness to devote personal time to charity, educational, and civic activities reflects well on the individual and the company, and it is commended. Employees must, however, refrain from acquiring any business interests or engaging in any other action outside of the Company that would, or appears to:

- Place an undue burden on their time and attention, robbing the Company of their best efforts when fulfilling their tasks on behalf of the Company ; or
- Create a conflict of interest - a duty, an interest, or a distraction - that could prevent you from exercising independent judgement in the best interests of the company.

RELATIONSHIPS WITH CLIENTS AND SUPPLIERS

Employees must refrain from investing in, or acquiring, a financial interest in any business organisation that has a contractual relationship with Dominion (or that provides goods or services to the Company) for their own accounts if such investment or interest could influence or give the impression of influencing their decisions while performing their duties on behalf of the Company.

COMPANY FUNDS AND OTHER ASSETS

Employees who have access to Company funds in any form must follow the Company's rules and procedures for documenting, handling, and protecting money. To combat fraud and dishonesty, Dominion sets high standards. Employees should immediately notify their supervisor or manager or call the Compliance Department if they become aware of any evidence of fraud or dishonesty so that the Company can examine the problem.

When your job requires you to spend Company cash or incur any reimbursable personal expenses, you must exercise sound judgement on behalf of Dominion to ensure that good value is received for all expenditures. Company cash and other resources, such as time, material, equipment, and information, are supplied for the Company's commercial purpose and are to be utilised for the Company's advantage only, not for personal gain. However, occasional personal usage (for example, checking personal email on a Company computer) is permitted as long as it does not interfere with job performance or disturb the office. We should not, in general, utilise Company equipment to conduct outside business or to support any religious, political, or other outside activity.

COMPANY RECORDS AND COMMUNICATIONS

As part of our routine business operations, we produce, maintain, and dispose of Dominion records in accordance with all Company rules and processes, as well as all legal and regulatory obligations. To satisfy the Company's legal and financial duties, as well as to manage the Company's business, accurate and trustworthy records of various sorts are required. As a result, all corporate records must be truthful, accurate, and full, and Company data must be entered promptly and properly according to Dominion's and other relevant accounting rules. Accounting and record-keeping employees must completely disclose and record all assets, liabilities, or both, and must comply with these responsibilities with thoroughness. Employees shall not make any fraudulent records or communicate falsely, whether internally or externally, including but not limited to: False expenditure, attendance, production, financial, or other reports and statements; or False advertising, deceptive marketing, and additional forms of misrepresentation

Employees shall not try to inappropriately influence, manipulate, or deceive any auditor, or interfere with any auditor performing an internal or independent audit of the Company's books, records, procedures, or internal controls.

Financial reports and public papers must provide comprehensive, fair, accurate, timely, and intelligible disclosures that conform with local rules and/or accounting standards. All workers with any responsibility for the compilation of such reports, including authoring, evaluating, and signing or certifying the material included therein, are subject to this requirement. If employees learn that information in a file or public communication was false or misleading at the time it

was made, or if new information will impact a comparable future filing or public communication, they should notify the Legal Department.

GENERAL EMPLOYEE CONDUCT

We treat each other with decency and respect at Dominion. Dominion is devoted to providing such an atmosphere since it allows every one of us to reach our greatest potential, which directly contributes to our economic success. Dominion is an equal opportunity employer committed to providing a work environment free of all forms of discrimination as well as abusive or harassing conduct. Employees must not participate in sexual or other types of harassment, or activity that might be regarded as such, such as using improper language, retaining or putting inappropriate things in their work area, or accessing inappropriate materials on their computer. Any employee who is mistreated or discriminated against should notify his or her supervisor, manager, Human Resources, or the Dominion Whistleblowing Channel at whistleblowing@dominion-cs.com.

Dominion wants its workers to be professional and businesslike in their behaviour. While on the job, drinking, using illicit drugs, gambling, fighting, and other unprofessional actions are absolutely banned.

HUMAN RIGHTS AND CORPORATE SOCIAL RESPONSIBILITY

Dominion values diversity, inclusion, and equal employment opportunities for all employees. We provide safe and professional settings and will not accept any sort of harassment or abuse. We adhere to all applicable employment regulations in all jurisdictions where we operate and ensure that all recruiting, selection, development, and promotion choices are made on the basis of merit, qualifications, skills, achievements, and potential. We do not make decisions based on race, religion, gender, age, national origin, sexual orientation, marital status, or handicap.

Dominion also respects human rights as well as the cultural values and customs of the nations in which we work. Any sort of illegal, abusive, or forced labour, including child labour, is unacceptable to us. We abide by all relevant labour regulations and offer competitive compensation and benefit packages.

PROTECTION OF CONFIDENTIAL & PROPRIETARY INFORMATION & DATA SECURITY

Dominion's private and proprietary information, including its intellectual property (IP) and trade secrets, as well as that of our customers, partners, and suppliers, are major strategic

investments vital to the Company's success. To protect these assets, we never provide sensitive information or trade secrets to anybody who does not need them for a business reason. We do not reveal such information to people outside the Company without management consent, and we safeguard the Company's interests by using a non-disclosure agreement or other confidentiality provision approved by the Legal Department.

Furthermore, Dominion is dedicated to safeguarding data from emerging and constantly developing cybersecurity risks, such as security breaches that may reveal personally identifiable information (PII), and takes proactive efforts to do so.

DEALING WITH THIRD PARTIES

When talking on subjects other than Company business, employees must keep their personal roles distinct from their Company ones. Employees are prohibited from using company identity, stationery, supplies, or equipment for personal or political purposes.

Employees must take care not to jeopardise the integrity or harm the reputation of the Company or any outside individual, business, or government body while engaging with anybody outside the Company, including but not limited to public authorities.

MEDIA INQUIRIES

Reporters and other members of the media may approach staff from time to time. Please refer any media questions to the Company's Legal Department, Communications Department, or a director. No press release may be issued without first consulting the Legal Department or a Company director.

ACCOUNTABILITY

Each of us is accountable for understanding and upholding the ideals and standards outlined in this Code, as well as for asking questions if we have any doubts concerning Company policy. If you have concerns about whether the standards are being fulfilled or are aware of violations of the Code, you should inform a supervisor, management, director, Human Resources, Compliance, Legal, Internal Audit, or the Dominion Whistleblowing Channel at whistleblowing@dominion-cs.com. The Company takes the standards set out in this Code seriously, and infractions may result in disciplinary action, including termination of employment.

REPORTING CONCERNS

Reporting Concerns

Any concerns or complaints concerning suspected violations of this Code, any other Company policy, or the law should be raised to your supervisor, manager, Human Resources, the Compliance Department, or the Legal Department as soon as possible.

All concerns or complaints must be reported to the Dominion Board by a supervisor, manager, director, the Human Resources department, the Compliance Department, the Legal Department or the Internal Audit Department.

Additionally, reports can be made directly through the Dominion Whistleblowing Channel at whistleblowing@dominion-cs.com. The Whistleblowing Channel accepts reports of suspected Code breaches 24 hours a day, 7 days a week. .

Accounting Concerns

If you have concerns about improper accounting, internal accounting controls, or auditing matters, you should notify the Dominion Whistleblowing Channel at whistleblowing@dominion-cs.com. The Whistleblowing Channel accepts reports of suspected Code breaches 24 hours a day, 7 days a week.

You should report any concerns you have, regardless of the suspected offender's name or position. The information will be treated as confidential by the Company (consistent with appropriate evaluation and investigation).

Investigation

All notifications of potential Code breaches will be considered carefully and investigated as soon as possible. The Ethics Sub-Committee will assess whether a concern or complaint of a violation pertains to dubious accounting, internal accounting controls, or auditing problems (an "accounting concern") as soon as it is received. Employees must help with the investigation of any alleged infractions. The Ethics Sub-Committee is in charge of reviewing each concern on a preliminary basis to decide whether an inquiry is necessary, as well as directing all parts of the investigation.

Confidentiality

To the extent it is practical and appropriate under the circumstances to protect the privacy of the persons involved, the Legal and Compliance Departments, as well as all members of the Ethics Sub-Committee, will not reveal the identity of anyone who reports a suspected violation or who participates in the investigation. Employees should be aware that personnel of the Legal Department are bound to operate in the Company's best interests and do not represent employees personally or legally.

Our Policy Against Retaliation

If you have reasonable grounds to think that another employee has broken this Code or participated in dishonest or unlawful behaviour, you must notify your supervisor, manager, director, Human Resources, the Compliance Department, or the Legal Department. The

Company will not retaliate against anybody who has expressed concerns about a potential breach of this Code or Company policy in good faith, including by adverse employment action. Immunity from retribution does not provide immunity from any offence. If you think you have been retaliated against for voicing any concerns about this Code or Company policy, you must immediately inform Human Resources, the Compliance Department, or the Legal Department.

Consequences of Misconduct

Conduct that is against the law, the Code, or other Company rules will result in disciplinary action, which may include termination of your employment contract, depending on local legislation. The severity of the disciplinary punishment and corrective action will be determined by the circumstances of the infraction. Failure to report inappropriate activity, creating a false complaint, or refusing to participate with an inquiry may result in disciplinary action.