

# Rosoka Software & Affiliates

## Intellectual Property Compliance Policy

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### I. Overview

IMT Holdings Corp believes that aside from its employees, its intellectual property (IP) is the Organization's most valuable asset. Management relies on various types of intellectual property (trademarks, patents, copyrights, trade secrets, design rights) for our success in the market.

Intellectual property helps Rosoka Software stay competitive, allows us to fund future successes, and supports each of our jobs.

Our policy is to secure and protect our intellectual property, internally through procedures and practices, and externally with the assistance from advisors and attorneys. We use Non-disclosure agreements when discussing our technology with others, and make sure that Resellers and Partners agree to protect our IP when entering into agreements with the organization. As a part of these procedures, we also wish to respect the IP of others as we develop our products and services, run our business, and work with business partners. In this spirit, the Organization has adopted the following IP Compliance Policies, with which we expect all of our employees, contractors and business partners to comply.

Corporate attorney is Jonathan C. Pavony, a Partner with Squire, Patton Boggs, L.L.P.  
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Intellectual Property attorney is Christopher Adams, a Partner with Squire Patton Boggs  
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## **II. Policies, Procedures and Records**

1. IMT Holdings and its subsidiaries and employees shall respect intellectual property (IP) and conduct business in compliance with IP-related laws and agreements with other companies.
2. IMT Holdings and its subsidiaries shall actively protect its own intellectual property.
3. IMT Holdings shall maintain an effective program of IP asset management, including maintaining an inventory and record of IP-related assets and agreements (Section VIII).
4. IMT Holdings shall not knowingly infringe on a third party's intellectual property in its products, services, or components, or disclose or use a third-party's trade secrets without the express or implied consent of the owner or as permitted by law.
5. IMT Holdings shall not knowingly purchase or use counterfeit or other infringing goods and services in running its business, including counterfeit trademark goods or infringing copyright material (such as software, publications, video, audio or other content).
6. IMT Holdings shall document and maintain a written or soft-copy record of all substantial transactions and uses that involve the exercise of intellectual property rights. (This includes for example licenses or assignments of rights; manufacture reproduction or distribution of patented, trademarked or copyrighted items; and disclosure and use of trade secrets.)
7. IMT Holdings and its subsidiaries shall require, through binding policies or agreements with employees and consultants that its personnel comply with IP laws, the Company's IP policies and IP-related provisions in agreements with other companies.
8. IMT Holdings shall develop and implement a management system to help ensure that all personnel follow its IP policies. This management system shall encompass all IP-related policies, procedures and adequate and accurate records necessary to implement measures and improve the Company's compliance.

### **III. Compliance Team, Scope and Risk**

1. IMT Holding Corp's intellectual property management and compliance shall be implemented through a cross-functional team including the President, the CTO and the CFO, and overseen by the Board.
2. A risk assessment shall be made which will include new products, services, and business opportunities, along with any and all relevant intellectual property compliance risk.

### **IV. Security and Confidentiality Management**

1. IMT Holdings, under the direction of its Chief Technology Officer, shall maintain physical security designed to effectively protect trade secrets, copyrighted material, confidential information, and IP-related records, master, tools, inventory and related materials.
2. IMT Holdings, under the direction of its Chief Technology Officer, shall maintain computer and network security effective for protecting trade secrets, copyrighted material, confidential and proprietary information, and IP related records, and for discouraging violations of Company's IP policies on the company's computers and networks.
3. The Chief Technology Officer shall restrict access to trade secrets, and employees with access shall be monitored for protection of those assets. The Chief Financial Officer or designated HR Administrator shall insure that all employees and contractors sign a confidentiality agreement before working for or with IMT Holdings or any of its subsidiaries, and shall keep all such information confidential.
4. IMT Holdings Corp and its personnel shall only make trade secrets and other proprietary information available to third parties on a "Need to know" basis, and subject to our Company's procedures and written agreements containing adequate confidentiality and other protections.

### **V. Training and Capacity Building**

1. The Chief Financial Officer, or designated HR Administrator, shall provide ongoing appropriate level training on intellectual property compliance to all relevant personnel.
2. He shall provide specialized training to those personnel responsible for the development and implementation of the IP asset management, protection and compliance program.
3. He shall also provide appropriate level training on IP compliance for relevant contractors, business partners and customers.

### **VI. Monitoring and Measurement**

1. IMT Holdings shall establish and operate a program to monitor the performance of its contractors and business partners in meeting the Company's policies on IP compliance.
2. IMT Holdings shall incorporate the information gained from the IP compliance monitoring program into the overall evaluation of contractors and business partners.

## **VII. Corrective Actions and Improvements**

1. The Compliance Team shall create and maintain a system to track and deal with IP compliance problems found through the monitoring program. The tracking system will identify the corrective action to be taken, the timeline and the responsible party.
2. IMT Holdings shall develop and implement an annual or other regular improvement plan for IP asset management, protection and compliance.

## **VIII. Company's Intellectual Property**

### **Corporate Name Protection**

IMT Holdings Corp incorporated in the state of DE on 11/13/2007

IMT Holdings Corp certified to do business in the Commonwealth of Virginia as of 5/8/2008.

IMT Holdings Corp certified to do business in the State of Florida as of 11/30/2015

Rosoka Software, Inc., incorporated in the Commonwealth of Virginia on 10/21/2013

IMT Solutions Corporation incorporated in the Commonwealth of Virginia on 10/21/2013

### **Patents, Provisional Patents and Patents Pending**

Rosoka Software, Inc. has filed four provisional patent applications as of this date, and all are related to Rosoka's unique Machine Learning process.

Applications which have been filed with the US Patent and Trademark Office include:

- 62/554,847 our 00002 Semantic Vector Rule Discovery, filed 9/6/2017
- 62/554,855 our 00001 Machine Learning Lexical Discovery, filed 9/6/2017
- 62/888,386 our 00109 Method for Dynamic Categorization through NLP, filed 8/16/19
- 62/888,387 our 00110 NLP Comprehension & Response System and Methods, 8/16/19

Applications have also been filed for PCT International Patent protection for:

- PCT/US2018/049716 our 00108 Semantic Vector Rule Discovery filed 9/6/2018
- PCT/US2018/049709 our 00107 Machine Learning Lexical Discovery filed 9/6/18

Management is also considering either filing a patent or obtaining additional copyright protection for:

- Use of Rosoka Entity Extraction on Elasticsearch (Open search engine based on the Lucene library).
- Rosoka for use on mobile devices and within a small OS environment, such as Android, for the purpose of obtaining entity extraction of people, organizations, phone numbers and locations
- Method for obtaining entities such as people, organizations, phone numbers and locations from unstructured text documents, analyzing the relationship between the entities and other known associations, to deliver content to a user.

## Trademarks, Registered Trademarks and Copyrights

IMT Holdings uses the U.S. trademark and copyright laws to protect its intellectual property, trade secrets and know-how regarding its developed products and applications. The USPTO search engine was utilized on 1/18/2014 and again on 7/31/2016 to verify that none of the following had been registered with the USPTO as of that date. As of the date of these procedures the Company had not registered any of the following tradements which it uses:

**Rosoka** <sup>TM</sup> – the word or name used to define Company specific extraction and geo-spatial software. Began using the name and trademark on or about 3/18/2008. Website [www.rosoka.com](http://www.rosoka.com) developed and publicly accessible prior to 10/1/2011. First notation for copyright purposes was made on March 18, 2008.

**Rosoka Series 6 (and 7)** - the word or name used to define Company specific extraction and geo-spatial software. Began using the name and trademark on or about 3/15/2017 when bundling extraction with a license manager along with expansion worker nodes. First notation for copyright purposes was made on March 15, 2017.

**Rosoka SDK** - the word or name used to define Company specific extraction and geo-spatial software. Began using the name and trademark since the early days of product development. First notation for copyright purposes was made on June 6, 2008.

**Rosoka Extraction**<sup>TM</sup> - the phrase or name used to define a Company specific extraction software product developed by the Company and available for licensing and distribution. Name first used on or about June 6, 2008 in conjunction with Rosoka SDK.

**Rosoka Extraction Plus**<sup>TM</sup> - the phrase or name used to define a Company specific extraction and geospatial software product developed by the Company and available for licensing and distribution. Name first used on or about 11/1/2013 to differentiate an extraction product that included geospatial functions. The product became obsolete with the introduction of Rosoka Series 6.

**Rosoka Language ID**<sup>TM</sup> - the phrase or name used to define a Company specific extraction software application developed by the Company and available as a stand-alone application for licensing and distribution. Name first used on or about 6/1/2009. This product became obsolete with the introduction of Rosoka Series 6.

**Rosoka Name Resolver** <sup>TM</sup> - the phrase or name used to define a Company specific software application developed by the Company and available as a stand-alone application for licensing and distribution on or about 12/1/2013. This product became obsolete with the introduction of Rosoka Series 6.

**Rosoka Cloud** <sup>TM</sup> – the phrase or name used to define a Company specific extraction software product developed by the Company and available for licensing and distribution. Name first used on or about 6/1/2013 and available on Amazon’s AWS since 7/1/2013.

**Rosoka Cloud API** - the phrase or name used to define a group or class of Company specific software applications available through an online hosted provider and available through subscription on or about March 1, 2016. Name first used on or about 3/1/2016.

**Rosoka News** <sup>TM</sup> – the phrase or name used to define a Company specific software application developed by the Company and expected to be available through the Web on or about January 1, 2015. Name first used on or about 4/1/2014.

**Rosoka Hosted Solutions** <sup>TM</sup> – the phrase or name used to define a group or class of Company specific software applications developed by the Company and expected to be available through subscription on or about January 1, 2015. Name first used on or about 4/1/2014.

**Rosoka GeoGravy** <sup>TM</sup> - the word or name used to define a Company specific extraction and geospatial software product developed by the Company to be either a stand-alone product or as an enhancement to Rosoka Extraction software. Name first used on or about 2/1/2013. Website [www.geogravy.com](http://www.geogravy.com) developed and publicly accessible on or about 3/1/2013. First press release using the name was issued on 4/2/2013

**Rosoka GeoTagging** <sup>TM</sup> - the phrase or name used to define a Company specific extraction and geospatial software product developed by the Company and available for licensing and distribution. Name first used on or about 11/1/2013. This product became obsolete with the introduction of Rosoka Series 6.

**Rosoka Studio Desktop** <sup>TM</sup> - the phrase or name used to define a Company specific software application developed by the Company originally released on December 1, 2015 as Rosoka Toolkit, then upgraded and released for sale on March 31, 2017 under this new name and also shortened to Rosoka Studio.

**Rosoka Studio** <sup>TM</sup> – the phrase or name used to define a Company specific software application developed by the Company originally released on December 1, 2015 as Rosoka Toolkit, then upgraded and released for sale on March 31, 2017 under this new name.

**Rosoka ToolKit** <sup>TM</sup> – the phrase or name used to define a Company specific software application developed by the Company and released for sale on December 1, 2015. Name first used on or about 4/1/2014.

**Rosoka Analyst** <sup>TM</sup> – the phrase or name used to define a Company specific software application developed by the Company and released for sale on August 15, 2016. Name first used on or about 4/1/2014.

**Rosoka CIOTES** <sup>TM</sup> – the name or phrase used to define a Company specific product, which was the result of upgrading Rosoka Analyst, including additional features and capabilities and then releasing it as a solution during the third quarter of 2017.

**GzBase** <sup>TM</sup> – the word or name used to define a Company specific data storage base and which contains specific geospatial data and gazetteer developed by the Company and utilized in

specific products and applications. Name first used on or about 2/1/2013.

**LxBase™** - the word or name used to define a Company specific data storage base which contains specific data and algorithms developed by the Company and utilized in specific products and applications. Name first used on or about 6/1/2008.

**Multilingual Products for a Multilingual World™** - the phrase or tag line created by the Company and used exclusively by the Company to define itself as a specific producer and developer of multilingual products for licensing, sale and distribution. First publicly used with press release dated 10/1/2011.

### **Developed Brand (Mark)**

#### **Actively Used to Date**



#### **Active and used in a limited manner through current date**



## Registered and International Registered Trademarks

None as of 12/31/2019

## Copyrights on published software

Three copyrights have been filed with the US Copyright Office (USCO) with IMT Holdings Corp as the author as IMT Holdings is the parent corporation of Rosoka Software, Inc.

Rosoka Toolkit – Author: IMT Holdings Corp – Date filed 9/28/2016

Rosoka Extraction – Author: IMT Holdings Corp – Date filed 9/28/2016

Rosoka Analyst - Author: IMT Holdings Corp – Date filed 9/28/2016

IMT Holdings maintains strict controls over access to its codes and trade secrets. Physical access is limited and password protected. All changes to product codes are documents as to date, lines changed and person who made the code change. Date of first code record is March 18, 2008.

### **Copyright Process:**

Unless reviewed for release as sample usage code all source files created are to be copyright marked (with the year of their creation) as the first lines of the files header with:

Markings prior to January 1, 2014 are noted as follows:

```
/*  
* Copyright 2012 IMT Holdings, Corp. All rights reserved.  
* IMT Holdings, Corp. PROPRIETARY/CONFIDENTIAL. Use is subject to license terms.  
*/
```

Notations from January 1, 2014 to present are as follows:

```
/*  
* Copyright 2014 Rosoka Software, Corp. All rights reserved.  
* Rosoka Software, Corp. PROPRIETARY/CONFIDENTIAL. Use is subject to license terms.  
*/
```

Sample usage code shall either be marked with the above or specific usage licenses as the header.

A copy of all released code is maintained in the IMT Software Control System repository, which will also include a complete listing of the change history. Periodically a physical copy of the IMT Software Control System repository is made and maintained in a locked storage facility which is off-premises.

## Purchased or Registered Domains and Web Addresses

[www.imtholdings.com](http://www.imtholdings.com) registered with Register.com on 1/19/2010. Currently hosted by google.com



[www.rosoka.com](http://www.rosoka.com) registered with Register.com on 2/8/2011. Currently hosted by google.com  
[www.geogravy.com](http://www.geogravy.com) registered with InMotionHosting.com on 2/7/2013, currently hosted by Google.com  
[www.imtsolutions-corp.com](http://www.imtsolutions-corp.com)

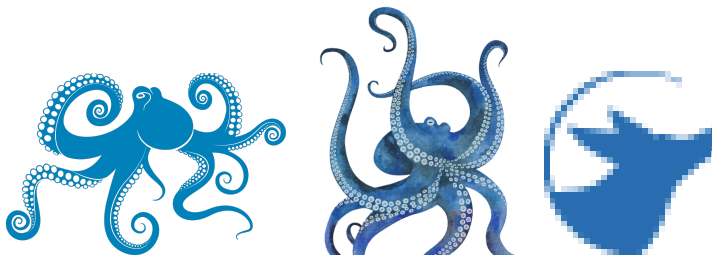
@IMTHoldings on Twitter  
@RosokaExtract on Twitter  
@GeoGravy on Twitter

## Purchased Rights for use Images and Logo

GettyImages 184655136



Used following Website, Image and Logo redesign by ImageWorks Creative 7/12/2016:



## IX. Non-Disclosure Agreement Obligations (NDA)

IMT Holdings Corp and its personnel have been trained not to disclose any proprietary or confidential information to anyone without knowing that a Non-disclosure Agreement has been signed or are in place to protect the assets of the Company. Any information disclosed is typically done so on a “need to know basis”. NDA’s are maintained by the President and CEO on all contractors, employees, partners, customers and potential customers. Typical NDA agreements are from two to five years. Our standard technology NDA covers a three-year period from the date signed, and the employee agreement covers the period through employment and two additional years.

A comprehensive NDA listing is maintained separately from this policy, and is available upon request.

## **X. Notes and Other Information**