

CODE OF
**Business Conduct
& Ethics**

January 2022


CITIZEN


BUSINESS


DUTY

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Message from the CEO



Dear Fellow Employee,

At PeopleConnect, one of our Five Core Values is Trustworthy. To be a strong company on the outside, we have to be a strong company on the inside.

Our PeopleConnect Code of Business Conduct & Ethics is an important part of this commitment. Our responsibility goes beyond fulfilling legal requirements. As employees and partners, we all have a duty to uphold the Code, company policies and the law by performing our jobs in an open and honest manner.

The Code, though not exhaustive, covers a variety of topics which help equip employees with skills necessary to make the right decisions. When we take the time to do what is right, we act with integrity and build trust, making the company stronger.

Please familiarize yourself with the Code and join with me in making the commitment to uphold it in all we do for the PeopleConnect family.

A handwritten signature in black ink that reads "Steven Gray". The signature is written in a cursive, flowing style.

Steven Gray
CEO

How To Report Violations

We are all responsible for protecting the PeopleConnect Culture of Integrity.

Violations of the Code:

Your concerns are taken very seriously. We will investigate reports of possible violations of the Code. You may report violations in confidence. If your situation requires that your identity be kept secret, your anonymity will be protected as necessary, but cannot always be promised. All employees are expected to fully cooperate with investigations conducted by the Company. Violations of the Code are subject to disciplinary action up to and including termination.

A potential violation is a serious matter. If you see something or are unsure if something potentially violates the Code of Business Conduct & Ethics (“Code”) or other applicable rule or law, speak up! We expect everyone to let us know about any suspected violation of our Code or other applicable rule or law. We do not tolerate retaliation against anyone for raising good-faith concerns.

How do I make a report or raise a concern about potential violations of the PeopleConnect Code or other applicable rule or law?

If you have a question about the Code or you are concerned about a potential violation of the Code or other applicable rule or law, you have a number of options:

1. Discuss the issue with your supervisor;
2. Discuss the issue with another supervisor or manager;
3. Contact the Human Resources Department;
4. Contact the Chief Legal Officer;
5. Report the issue using the EthicsPoint Hotline.

EthicsPoint Hotline

Report issues or violations using the following methods:

 Phone: (888) 261-1620

 Web: <http://www.peopleconnect.ethicspoint.com>
select the “Make a Report” link at the top of the page

No Retaliation Policy:

PeopleConnect does not tolerate retaliation for asking questions or raising good-faith concerns about possible violations of the Code or other applicable rule or law.

Code of Conduct



CITIZEN

01

Our Code applies equally to all.

02

Safeguard the health and safety of our team members.

03

Protect the privacy of all individuals.

04

Be inclusive, value diversity and support team members in realizing their potential.

05

Use email, Internet access, telephones and computers responsibly and honorably.



BUSINESS

06

Commit to providing safe, good-quality products and services. Address and do not hide risks or mistakes.

07

Compete vigorously but do not use illegal or unethical means to gain an advantage over a competitor.

08

Do not tolerate, and actively oppose, corruption in our businesses.

09

Protect confidential information and respect that of our competitors.

10

Act in the Company's best interests and spend its money solely for business purposes.



DUTY

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Obey all the laws on working hours and compensation.

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Ensure that our books and records are accurate, complete and maintained.

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Limit the use of Company resources to support political campaigns or causes.

14

Comply with international trade laws.

15

Communicate accurately with the public.

01

Our Code applies equally to all.

The Code applies to everyone at PeopleConnect – including the Board of Directors, Company officers, employees, agents and contract workers.

REMEMBER

- Raise a concern if you believe there has been a violation of the Code or of any law or regulation under which we operate.
- Do not tolerate threats or retaliation. PeopleConnect does not tolerate threats, intimidation or retaliation against anyone who in good faith raises a concern or reports a possible Code violation.
- Communicate to contractors, agents and other business partners that they are expected to uphold the standards of the PeopleConnect Code when working with or on behalf of PeopleConnect.

ENSURING COMPLIANCE AND ACCOUNTABILITY

- Employees are expected to follow the Code and assist their fellow employees and PeopleConnect partners in understanding and complying with the Code.
- Supervisors will help make their employees aware of the Code's importance and requirements, and help to implement programs and procedures to promote it.

02

Safeguard the health and safety of our team members.

It is essential that our employees work in healthy and safe environments.

ALWAYS FOLLOW SAFETY PROCEDURES AND GUIDELINES.

- Understand and follow the safety policies and procedures related to your work.
- Regularly look for ways to improve workplace safety.
- Do your best to avoid accidents and to help others avoid them.
- Report all accidents, near misses and safety issues. In the instance of a serious accident or emergency situation, immediately call 911. Contact your supervisor or Human Resources to report any safety issues or non-emergency accidents.
- Help to create a physically and emotionally safe workplace.

DO NOT COMMIT OR PERMIT VIOLENCE.

- We do not tolerate violent behavior, threats to people or property, or physical intimidation or coercion.

NEVER BE UNDER THE INFLUENCE OF DRUGS AT WORK.

- At work, you must remain free from the influence of illegal drugs or any substances that may impair your ability to work safely and effectively.

03

Protect the privacy of all individuals.

We use personal data only to support PeopleConnect operations and to provide employee benefits.

We inform individuals about the collection and processing of their data, as well as their rights towards their personal data.

We have safeguards to protect personal data; we limit data access to employees who need it for business purposes; and we follow local data protection and privacy laws.

FOLLOW DATA PROTECTION POLICIES.

- You're required to follow PeopleConnect policies to protect data and privacy. If you don't understand a policy or procedure, you're responsible for getting an explanation.

BE CAREFUL NOT TO BREACH PRIVACY.

- Gather only the information that you need for your work.
- Unless you have authorization, do not access any system or database containing private information, such as employee or personnel records, customer personal data, email or your co-workers' personal messages.
- Use data for the original business purpose only.
- Make sure that you don't disclose personal data by accessing or sending it.
- Do not keep personal data for longer than required for the business purpose.

04

Be inclusive, value diversity and support team members in realizing their potential.

PeopleConnect provides equal opportunity in hiring, salary, benefits, advancement, discipline, termination and all other aspects of the employment relationship.

RESPECT EQUAL OPPORTUNITY

- Focus on the value that people add. We do not discriminate on the basis of race, gender, sexual orientation, age, pregnancy, caste, disability, ethnicity, religious beliefs or any other factors protected by law.

OPPOSE HARASSMENT

- Do not tolerate physical or mental harassment or any other harmful behavior.
- Harassment includes language or conduct that others may find derogatory, intimidating or offensive.
- Immediately report all incidents of harassment to your supervisor or Human Resources.
- Do not tolerate retaliation against anyone for raising a good-faith complaint of harassment or discrimination.

05

Use email, Internet access, telephones and computers responsibly and honorably.

PeopleConnect computing resources should be used for Company purposes.

HERE'S HOW YOU CAN HELP:

- Use electronic media properly.
- Information on Company computer systems, including email and other Internet-related systems, is the property of PeopleConnect, to be used for Company business.
- Do not use Company resources to offend, harass or threaten others or to access, send or store illegal or generally offensive material.
- While you're at work or using a Company computer or mobile device, do not visit Internet sites with offensive content related to sex, race, religion or other protected categories.
- Do not use Company resources to reproduce, display, distribute, or store materials that violate any party's trademark, copyright, licensing or other intellectual property rights.

06

Commit to providing safe, good-quality products and services. Address and do not hide risks or mistakes.

The Code includes our commitment to providing safe and high-quality products, services and solutions.

HERE'S HOW YOU CAN HELP:

You should immediately contact management or your supervisor if you believe there is:

- Any deficiency in product design, production or maintenance that threatens consumer safety or security.
- Anything that may harm the quality of our products or services.
- Anything that may harm PeopleConnect's reputation.
- Anything that may harm PeopleConnect's financial interests.

Where can I find more information?

If you have any questions or concerns about possible risks talk with one of the contacts listed on the "[Reporting Concerns and Asking Questions](#)" section of the Code.

07

Compete vigorously but do not use illegal or unethical means to gain an advantage over a competitor.

Using illegal or unethical means to obtain competitive advantage is prohibited.

HERE'S HOW YOU CAN HELP:

- Follow all anti-trust and competition laws.
- Do not join PeopleConnect competitors or business partners in agreements or understandings that limit competition.
- For example, do not agree to fix prices, divide up products, territories, customers or markets, or limit new product offerings.
- Do not make false, baseless or misleading remarks about PeopleConnect, its competitors or their products.
- Do not disclose or discuss confidential business information with competitors or share how PeopleConnect prices, markets, services or otherwise competes.

08

Do not tolerate, and actively oppose, corruption in our businesses.

We win business with the integrity of our products, services and personal character. We do not seek business by trying to corrupt the judgement of our customers. We do not tolerate bribery of individuals. We neither provide nor receive lavish or extravagant gifts

REMEMBER

- Do not offer, pay, give or promise any favor, service, entertainment, meal, gift or any other thing of value to any commercial or governmental customer to get business, or to any government employees or political official or their family members to get preferential treatment for PeopleConnect.
- Do not pay 'grease' or facilitation payments. These are small bribes to individuals to make them perform a government service to which we are already entitled.
- Before you make a gift or offer, ensure that the value of the gift would not reasonably be seen as an attempt to influence an official decision. Talk with the Legal Department to see if the recipient is considered a "government employee" or "official." Seek approval before you act.
- Do not offer employment, benefits or other profitable opportunities to government employees and officials, or to private citizens who can provide PeopleConnect with an economic advantage without first consulting with the Legal Department.
- Obey all anti-corruption and bribery laws.
- Accurately record in PeopleConnect's books all of your transactions including your expenses and any gifts or entertainment that you provide.
- Do not associate with business partners who engage in corrupt practices. Regularly screen business partners and stop working with them if you reasonably suspect corruption.
- Do not tolerate retaliation for asking questions or raising good-faith concerns about a possible violation of this Guiding Principle.

09

Protect confidential information and respect that of our competitors.

Sharing the Company's confidential information is not allowed.

SHARING THE COMPANY'S CONFIDENTIAL INFORMATION IS NOT ALLOWED.

- Disclose confidential information only on a 'need-to-know' basis, even with other PeopleConnect employees.
- Never disclose confidential information outside of PeopleConnect unless you already have a non-disclosure agreement or a confidentiality agreement approved by the Legal Department.
- Secure confidential information where others cannot see when you are not reviewing it.
- Report all suspected breaches of confidentiality.

PROTECT THIRD-PARTY, NON-PUBLIC INFORMATION.

- Do not seek or receive competitors' trade secrets or confidential information unless the disclosure is covered by a non-disclosure or confidentiality agreement approved by the Legal Department.
- We compete fairly and honestly. Do not use illegal or unethical means to learn a competitor's confidential information.
- If you have non-public, confidential information from previous employment with a competitor, then you must continue to keep that information confidential, even from PeopleConnect.

PROTECT PEOPLECONNECT'S CONFIDENTIAL INFORMATION.

- Safeguard all intellectual property, including copyrights, patents, licenses, trademarks and other trade secrets.
- Protect all of PeopleConnect's confidential information even after you stop working with PeopleConnect.

10

Act in the company's best interests and spend its money solely for business purposes.

You may not give or receive anything of monetary value to influence business judgement unduly, or use PeopleConnect information, property or authority for personal gain.

- REMEMBER**
- Promote PeopleConnect's best long-term interests when making business decisions.
 - Do not seek or receive personal economic gain, beyond your normal company pay, for being an PeopleConnect director, officer, employee or contract worker.
 - Disclose to your supervisor any situation in which your family, friends or business associates might profit based on your relationship with PeopleConnect.
 - Report financial interests that you and your family have in entities that do business with PeopleConnect.
 - Do not pursue any business opportunity that you discover through your association with PeopleConnect for personal gain or the gain of any entity other than PeopleConnect.
 - Do not work for a customer, supplier or competitor of PeopleConnect while PeopleConnect employs you.
 - Think about how it will appear if you accept gifts or entertainment from suppliers or customers wanting to do business with PeopleConnect. When possible, seek guidance before giving or receiving things of value. If you personally accept something of more than minimal value, you must keep a record of it and report it promptly to your supervisor.
 - Use company funds prudently.
 - You are personally accountable for your use of company funds in any form.

Where can I find more information?

For more information see our [Conflict of Interest Policy](#).



11

Obey all the laws on working hours and compensation.

Every employee has the right to work within the limits established by law. We fairly compensate our employees.

REMEMBER

- Our team members work within the limits established by law.
- When circumstances require you to work beyond normal hours, we provide benefits or overtime compensation as required by law.
- We will pay fairly in the market and meet or exceed all legal requirements related to compensation.
- PeopleConnect will give you full details on payroll deductions for taxes and benefits.
- PeopleConnect's compensation and benefits are designed to enable our employees to meet their basic needs and provide them with the opportunity to improve their skills and capabilities.

12

Ensure that our books and records are accurate, complete and maintained.

Keep trustworthy books, accounts and records.

REMEMBER

- Company books and records must be complete, accurate and reliable, following Generally Accepted Accounting Principles.
- Be precise and complete when you record transactions.
- Don't make false or misleading entries, or omit or conceal required information, such as the payment amount or its actual purpose.
- Follow laws, regulations, industry standards and Company policies when you produce, store or destroy records and documents.
- Do not keep hidden or unrecorded funds, accounts or assets.
- Maintain the supporting documentation required by relevant policies.

13

Limit the use of Company resources to support political campaigns or causes.

Generally, PeopleConnect does not get involved in political campaigns or political issues. Decisions on whether the company will support a political candidate or issue must be made at a high level within PeopleConnect.

HERE'S HOW YOU CAN HELP:

- Never offer contributions, payments or anything of value from PeopleConnect to government employees, officials or political candidates with the intent to influence them or gain an improper advantage for the Company.
- Always get approval from the Chief Legal Officer before offering or using any PeopleConnect funds, services or other resources to support any official, political organization or candidate.
- Accurately document in PeopleConnect's records any donation or contribution to any campaign, political organization or candidate.

14

Comply with international trade laws.

We follow the trade laws of all countries where PeopleConnect conducts business.

WE FOLLOW THE TRADE LAWS OF ALL COUNTRIES WHERE PEOPLECONNECT CONDUCTS BUSINESS, INCLUDING LAWS CONCERNING:

- Importing or exporting specific goods, services or technology.
- Prohibiting transactions with specific countries, entities or people.
- Participating in international boycotts.
- Government approval, licenses or any other requirements necessary to complete a transaction or sale.

HERE'S HOW YOU CAN HELP:

- Keep accurate records of all international transactions.
- Follow all of PeopleConnect's policies and processes when importing anything.
- Make efforts to ensure that customers, business partners, vendors, service providers, agents, consultants and distributors follow PeopleConnect policies and procedures.
- Engage companies and business partners that agree to obey international trade laws.

Where can I find more information?

You can contact the Chief Legal Officer for guidance on any transaction.

15

Communicate accurately with the public.

We ensure that our communications are truthful and accurate. We do not release misleading information.

REMEMBER

- Do not speak to the media unless you have been specifically authorized by the CEO. Refer media questions about PeopleConnect to the Chief Legal Officer.
- Take care when discussing PeopleConnect outside the company – in public places, with friends and family, and on the Internet, in public forums, blogs and social-networking sites.
- Never disclose private company information without prior and proper authorization.
- Neither say nor imply that you represent the Company unless you are actually authorized to do so.
- Only those expressly authorized by the CEO may speak on behalf of PeopleConnect.
- When speaking at conferences, industry meetings, etc., be sure to clarify that your remarks and comments are your own, unless you have been specifically authorized by the CEO to speak on behalf of PeopleConnect.
- If you are authorized by the CEO to speak on behalf of PeopleConnect, you must provide accurate information and avoid speculating.

Ethical Decision Making

To make an ethical decision, ask yourself these questions.

01

Is the action or decision consistent with the letter and spirit of the Code?

- When in doubt, ask – talk to your manager or supervisor or the Legal Department.

02

Is it legal?

- If it isn't, don't do it.

03

Does it follow PeopleConnect policies and procedures?

04

What would others think of my decisions or actions?

- How would it make me feel if my actions or decisions were known to my family or friends?
- How would I explain to those affected by my actions or decisions?

05

How would I feel if my actions appeared in the news media, on television or on the Internet?

Ultimately use your judgment and common sense; if something seems unethical or improper, it probably is.

People X Connect™

The most popular place to learn about people.