



Code of Conduct & Ethics Policy

Secure-24, LLC and its affiliates and subsidiaries throughout the world are committed to the highest standards of legal and ethical conduct and to the growth of its businesses within the framework that is highlighted within this Code of Conduct and Ethics Policy. Secure-24 urges everyone to review this Code thoroughly and discuss it with co-workers, share it with customers, vendors, contractors and business contacts. The Code outlines the behavior expected of everyone acting on behalf of Secure-24 or conducting business with Secure-24. While it cannot address every situation, anyone can and should seek to have any questions or concerns answered by a supervisor, Human Resources representative, or the Legal Department of Secure-24.

Secure-24 Commitment and Core Values

Secure-24's mission is to provide our clients with a competitive advantage through the provision of information technology services of the utmost integrity in alignment with the core values of Secure-24. Secure-24's vision is to become the premier global leader in quality and automation in the information technology services field fostered by the drive and ambition of the best, brightest and most passionate customer focused professionals in the industry. Secure-24 deeply cares about each person with whom it conducts business and strives to never disappoint an employee, customer, business associate or friend. In its basic context, Secure-24 empowers its employees to make a difference in other people's lives!

Secure-24 values integrity, honesty, and truly partners with its customers and clients, is passionate about its business and provides products and services of the highest quality. Secure-24 fosters an environment that promotes honesty and fairness in everyday engagements, integrity in decisions, ethics in action, respect for all individuals, and compliance with all laws, rules and regulations, as well as licensing requirements and contract commitments to its customers and vendors.

These goals and ideals form Secure-24's basic core values. Secure-24 is committed to putting its customers first by providing excellence in information technology services and experiences. Striving for excellence daily is what defines Secure-24 from its competitors and what creates a meaningful and challenging work environment for its employees.

INTEGRITY

Integrity is at the heart of Secure-24. Secure-24 operates honestly and with the highest ethical standards and maintains these standards because trust is at the foundation of its relationships with customers, communities, employees and business and vendor associates.

RESPECT

It is critical that Secure-24 respects everyone at every level of its business. Secure-24 embraces diversity, individuality and listens carefully to other's opinions, ideas and concerns.



PERFORMANCE EXCELLENCE

Secure-24 strives to achieve very high standards of performance. Secure-24 embraces innovative ideas and solutions and is dedicated to the commitment of its employees to make the ideas and solutions a reality for its customers.

ACCOUNTABILITY

Secure-24 takes responsibility for its actions as an organization, as does each of its employees as individuals and team members. As a team, Secure-24 remains accountable, successfully working together and supporting one another to ensure that Secure-24 never disappoints its customers, vendors or fellow employees.

Integrity Program

Secure-24 fosters open communication by all parties with whom it conducts business, employees, consultants, vendors, business associates and customers. All parties are strongly encouraged to act ethically, with integrity, and report illegal, fraudulent, dishonest, or unethical behavior by any employee, vendor, contractor, customer or other individual or organization in a business relationship with Secure-24. Secure-24 has an open door policy and individuals can raise any concern to the management of Secure-24, its HR Department or its Legal Department at any time.

Secure-24 is always available to listen, investigate and respond as may be required. Employees who report suspected violations are protected from retaliation. Should an individual desire to remain anonymous, Secure-24 has established a toll-free number (1-866-526-1051) to report ethics concerns or alleged violations of this Code, which is available 24 hours a day / 7 days per week. It is truly an anonymous way to report known or suspected violations or ethical concerns. Secure-24 is not able to identify any caller. If in doubt about proper conduct, call the hotline.

Corporate Responsibility Guidelines

- **Diversity and Inclusion.** Secure-24 believes that diversity in the workplace is a valuable asset and promotes cultural and individual differences. In an ever-changing global market, Secure-24 requires all employees to foster respect, dignity and fair treatment of all. By embracing diversity, Secure-24 further fosters growth, innovation and leadership. Secure-24 does not discriminate in employment or employee treatment based upon any of the following characteristics: race, color, religion, gender, age, ethnic or national origin, veteran status, disability, sexual orientation or preference, gender identity, marital status, citizenship status, genetic information, or any legally protected personal characteristic or status.
- **Harassment and Abuse.** Secure-24 will not tolerate any form of harassment including harassment based on race, color, religion, gender, age, ethnic or national origin, veteran status, disability, sexual orientation or preference, gender identity, marital status, citizenship status, genetic information, or any legally protected personal characteristic or status.
- **Preventing Workplace Violence.** Acts or threats of physical harm or violence, hostile physical contact (including intimidation, harassment, coercion), or any other actions that are threatening or hostile in nature that occur on Secure-24 premises or affect Secure-24 business will not be tolerated.

- **Safety and Health.** Secure-24 uses internal and external expertise to provide a safe work environment. To support this commitment, employees, contractors, vendors and customers are responsible for observing the safety and health rules, policies, practices, laws and regulations that may apply to protect themselves and other persons while present at Secure-24 facilities. All accidents, injuries, occupational illnesses and unsafe practices or conditions must be reported immediately to the management of Secure-24.
- **Impairment and Substance Abuse.** Secure-24 requires a drug-free workplace to ensure the health and safety of its work environment. Using, possessing, distributing or being under the influence of alcohol or an illegal or illicit drug, while on-site or working, is prohibited.
- **Environment.** Secure-24 cares about the quality of the environment and complies with all applicable environmental laws, rules and regulations in all countries in which it operates.
- **Secure-24 Communications.** All marketing and external communications prepared by Secure-24 or prepared by any other vendor, contractor, customer or person are required by Secure-24 to be truthful and factual and must avoid misleading or unfair representations. Any response to requests for information from Secure-24 must be directed to the marketing department or the legal department. These requirements apply to information conveyed in any form, including but not limited to, print advertising, marketing, publications, audio, web-based media, radio, television, press releases, interviews, Secure-24's web site, and electronic advertisements.
- **Conflicts of Interest.** In daily dealings, whether with employees, customers, vendors, contractors and competitors, all individuals must act in the best interest of Secure-24 and not based on personal relationships or personal advantage. Any appearance of a conflict of interest must be scrupulously avoided.
- **Corporate Opportunities.** At all times, employees must advance the legitimate interests of Secure-24 when business opportunities arise and are prohibited from using Secure-24 property, information or position for personal gain.
- **Fair Dealings.** Secure-24 selects its vendors in a fair, equitable and nondiscriminatory manner based upon appropriate criteria such as quality, price, service, delivery, financial strength, capabilities, terms and other similar competitive factors. At all times, Secure-24 deals fairly with vendors, customers, employees, contractors and competitors and never will take unfair advantage through improper manipulation, concealment, abuse of privileged information, misrepresentation of material facts or through some other unfair dealing practice.
- **Corporate Responsibility in Supplier Contracts.** Secure-24 is committed to not only provide the core commercial terms within a contract but specifically to incorporate this Code in all contracts with vendors and business partners.
- **Insider Trading.** Individuals may, in the course of performing duties or engagements, come into possession of information that would affect securities prices, either positively or negatively, that is not generally available to the investing public about companies with whom Secure-24 conducts business, typically referred to as "insider information." Buying or selling stocks using "insider information" violates this Code and the law.
- **Bribes, Kickbacks, Gifts and Entertainment.** Secure-24 prohibits the giving, offering, solicitation, or receipt, directly or indirectly, of any bribes, "kickbacks", gifts or other things of value designed to influence or compromise the conduct of the recipient. Gifts to, or entertainment of, domestic and foreign government officials and employees involve special rules, laws and regulations, so with few exceptions, they are generally prohibited. Gifts or entertainment



generally available to the public and of a nominal value may be offered and accepted only to the extent such are ordinary and customary, reasonable in the context, not lavish as measured by reasonable standards in the business community, properly reflected in Secure-24 financial records and consistent with laws and policies of Secure-24.

- **Information Security.** Secure-24 and its employees have a legal obligation to ensure the privacy of the Non-Public Personal Information (NPPI) of its customers and other privacy related information. Secure-24's Information Security Program must comply with all federal laws, rules and regulations including, but not limited to, the Health Insurance Portability and Accountability Act (HIPAA), International Traffic in Arms Regulations (ITAR), Sarbanes-Oxley (SOX), Payment Card Industry Data Security Standard (PCI DSS) and the United States Federal Gramm-Leach- Bliley Act (GLBA). Secure-24 employees understand their responsibilities in protecting such information, and take the appropriate steps to maintain information security in accordance with Secure-24's Information Security Program.
- **Antitrust.** Secure-24 is subject to antitrust and competition laws, which prohibit agreements or actions that may restrain trade or reduce competition, such as fixing or controlling prices, boycotts of vendors or customers, disparagement of competitors, coordination with competitors to gain market share and certain exclusive dealings arrangements.
- **International Sanctions, Export Control and Customs.** Secure-24 complies with trade sanctions that restrict trade with certain specified countries, persons and entities, in accordance with the U.S. trade restrictions specifically stated in government websites. Secure-24 also complies with all applicable national and multinational export control laws and customs laws.

Knowledge, Understanding and Compliance

Knowledge, understanding and compliance with the Code are critical keys to the success of Secure-24. The Code outlines the behavior expected of all employees, contractors, vendors, customers and any person with whom Secure-24 conducts business. Any violation of the Code must be promptly reported to management of Secure-24 or reported through the hotline at 1-866-526-1051.