

Business Partner Code of Conduct

Here at TPx Communications (“TPx”), we are committed to conducting our business in an ethical, legal, and socially responsible manner. Gaining the trust of customers, vendors, employees, and the community starts with a culture based on these fundamental values. This Business Partner Code of Conduct (“Code of Conduct”) applies to all business partners, including suppliers, vendors, contractors, consultants, resellers, and anyone else conducting business with or on behalf of TPx (“Business Partners”).

Business Partners shall commit to meeting all requirements of this Code of Conduct and shall otherwise promote:

1. compliance with all applicable laws, rules, and regulations;
2. fair and lawful immigration, hiring and employment practices;
3. fair and accurate financial reporting; and
4. a culture that upholds ethical conduct, honesty, and accountability.

This Code of Conduct serves as a guide that establishes the minimum standards that TPx expects of each of its Business Partners, and in no way reduces, replaces, or otherwise limits any legal or contractual obligations each Business Partner may have with TPx.

1. Compliance with the Law

Business Partners must understand and comply with all applicable laws, regulations, rules, controls, and orders applicable to their business, including, without limitation:

- Bribery and corruption
- Insider Trading
- Fair competition and Fair Dealing
- Trade controls and money laundering
- Charitable and political contributions
- Data privacy and information security
- Conflicts of interest
- Marketing and advertising

2. Bribery and Improper Advantages

Business Partners must conduct all business with integrity and transparency. Business Partners are expected to strictly prohibit all forms of bribery and corruption, regardless of whether they involve a public official or private person. Business Partners must be truthful in their business interactions and shall not tolerate the promise, acceptance, or offering of bribes, kickbacks, and all other means of obtaining an undue or improper advantage, such as gifts, payments, fees, services, discounts, valued privileges, or other favors where these would, or might appear to, improperly influence a business transaction.

Business Partners shall not tolerate any form of extortion or embezzlement. Business Partners are expected to believe in fair business dealings and not partake in unfair business advantages through the abuse of privileged information, misrepresentation of material facts, or any other unfair or dishonest practices.

3. Gifts, Meals & Entertainment

Business Partners must not accept or provide any gift, meal, or entertainment if it will obligate or appear to obligate the recipient. Business Partners must exercise good judgment, discretion, and moderation when giving or accepting gifts or entertainment in business settings.

There are more stringent rules concerning gifts and entertainment provided to government officials. Offering anything of value to a government official is, in many cases, prohibited by law.

4. Fair Competition & Fair Dealing

Business Partners must support free and fair competition and comply with antitrust/competition laws applicable to its business activities in all jurisdictions in which it operates. Accordingly, Business Partners shall not unlawfully: (i) enter into any agreement with any of its competitors with regard to price, terms or conditions of sale, production, distribution, territories, or customers or employee wages; or (ii) exchange or discuss with any of its competitors pricing, marketing plans,

manufacturing costs, or other competitive information, amongst other measures required by applicable law.

Business Partners must deal fairly with customers, suppliers, competitors, and employees, and must not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any unfair dealing practice. Business Partners shall use good faith efforts to perform contractual obligations and to comply with this Code of Conduct even in the event of challenges that arise which are outside of Business Partners' control.

5. Trade Controls and Anti-Money Laundering

Business Partners must comply with the various economic sanctions' programs, anti-money laundering and export control requirements administered by the United States and other jurisdictions where it conducts business. Such laws prohibit Business Partners from participating in certain transactions involving restricted countries or parties, be it directly, or indirectly through third parties.

Business Partners shall not provide, sell, or transfer any products, services, technology, software, or technical data to, or otherwise engage in business with, any of the following:

- Parties targeted for boycotts, embargoes, sanctions, or other similar measures by the United Nations Security Council;
- Parties appearing on the European Union's Consolidated Sanctions List; the United Kingdom's List of Consolidated Financial Sanctions Targets;
- Parties appearing on the Denied Persons List, Entity List, and Unverified List administered by the U.S. Commerce Department;
- Parties appearing on the sanctions lists administered by the U.S. Treasury Department's Office of Foreign Assets Control ("OFAC") and the U.S. State Department;
- Countries or regions subject to U.S. embargoes or sanctions including, but not limited to, Cuba, Iran, North Korea, Syria, and the disputed Crimea Region; or
- Parties that are at least 50% owned or controlled by parties subject to sanctions programs administered by OFAC, whether individually or in the aggregate.

Business Partners shall not tolerate or engage in activity that directly or indirectly contributes to the Arab League Boycott or other unsanctioned boycotts during the course of business dealings. Business Partners must comply with all applicable trade controls and will not cause TPx to be in violation of those laws. Business Partners must comply with their obligations under Anti-Money laundering (AML) laws and regulations, specifically the risks associated with third parties.

6. Charitable and Political Contributions

TPx's Business Partners are evaluated on a number of objective commercial factors including but not limited to cost, quality, ability, and availability to do the work, and previous performance (where applicable). These choices are not influenced by a Business Partner's giving or not giving to any particular charity.

TPx employees are strictly prohibited from soliciting Business Partners for a charitable donation or suggesting that a Business Partner's charitable donation may affect their business or future with TPx. Business Partners shall refuse any requests for donations of this nature.

Business Partners must comply with U.S. federal law that prohibits making contributions or expenditures in connection with federal elections, as applicable. As each U.S. state has additional laws, rules, and regulations governing political contributions in state and local elections, Business Partners must comply with the laws in the jurisdiction(s) in which they do business. Business Partners must agree not to make any contributions or expenditures in connection with federal elections nor any other U.S. state elections on behalf of TPx. Additionally, Business Partners must follow the laws, regulations, and orders applicable to the jurisdictions outside of the U.S. where it conducts business that prohibit similar activities.

7. Data Protection and Information Security

Business Partners will adhere to all applicable data protection and data privacy laws and regulations, and will implement and maintain commercially reasonable administrative, physical, and administrative safeguards that are standard in their

respective industries, and that are designed to prevent unauthorized access or use of TPx confidential information.

8. Conflicts of Interest

Business Partners will immediately notify TPx if they become aware of any potential conflict of interest during the course of their business dealings with TPx or one of its representatives acting on its behalf. Business Partners must agree to use best efforts to avoid situations which could cause a conflict of interest with TPx.

9. Marketing and Advertising

If Business Partners are marketing products, services, or other offerings on behalf of TPx, Business Partners must represent and warrant that Business Partner will comply with all applicable advertising and marketing laws, orders, rules, and regulations. Specifically, but not exhaustively, this provision shall include the Lanham Act, the Controlling the Assault of Non-Solicited Pornography and Marketing Act (CAN-SPAM), the Telephone Consumer Protection Act, and other such laws, rules, orders, and regulations in all jurisdictions in which Business Partner conducts business for, and on behalf, of TPx.

10. Immigration, Hiring and Employment Practices

Business Partners must comply with applicable national, federal, state, and local laws forbidding discrimination in employment based on protected characteristics, such as on the basis of race, color, religion (including religious dress and grooming practices), age, national origin, ancestry, ethnicity, sex (including pregnancy, childbirth, breastfeeding or related medical conditions), gender (including gender identity, gender expression, transgender status or sexual stereotypes), sexual orientation, marital or family care status, status as a victim of domestic violence, sexual assault or stalking, military/veteran status, physical or mental disability, medical information (including genetic information or characteristics, including those of a family member), immigration status or citizenship status, political affiliation or membership in any other group protected by national, federal, state, or local law as it may vary by jurisdiction. Business Partners must also comply with applicable national, federal,

state, and local laws forbidding retaliation against individuals who engage in protected activity.

Business Partners must commit to maintaining a respectful workplace. This includes a working environment that is free from unlawful harassment based on protected characteristics, including sexual harassment.

Business Partners must:

- Implement and maintain a reliable system to verify the identity and employment eligibility of all workers including, but not limited to, verification of age eligibility and legal status of foreign workers; and
- Implement and maintain a reliable system to verify its workers are not a known risk to TPx in light of access such workers will have to confidential or proprietary information, facilities, network and systems, financial data and other data protected by privacy law or applicable agreements between Business Partners and TPx including, but not limited to, standard background checks or other such verifications that are common and lawful in our industry and jurisdiction.

11. Labor

All labor must be voluntary. Business Partners shall not support or engage in slavery or human trafficking. Without limiting Business Partners' obligations hereunder, Business Partners shall not, and shall ensure that its business partners do not, support or engage in, or require any compelled, involuntary, or forced labor; labor to be performed by children; bonded labor; indentured labor; and/or prison labor.

12. Compensation

Business Partners must ensure that their employees are paid at least the minimum wage required by national, state, and local laws, including overtime compensation at the rate applicable in their country, and that their employees be provided legally mandated benefits.

13. Health, Safety & Environment

Business Partners must provide a safe and healthy working environment to their employees to prevent accidents and injuries in accordance with national, state, and local laws. Proactive measures must be taken to prevent workplace hazards. Business Partners must also comply with applicable environmental laws and regulations and keep current all required environmental registrations and permits applicable to their business.

Business Partners shall conduct business in compliance with all applicable national and international environmental, health, and safety regulations.

14. Financial Reports and other Records - Disclosure

In some countries, including the United States, it may be a violation of law if a company fails to maintain accurate books and records. Therefore, all TPx Business Partners are required to fully and accurately record all business transactions and maintain those records per applicable retention guidelines. This is particularly important with regards to financial and operational reporting, business related transactions including timecard and expenses, and quality, safety, and procurement records.

15. Culture of Ethical Conduct, Honesty, and Accountability.

Business Partners are expected to assess and understand their respective legal and compliance risks, and to better understand what is needed to uphold and promote the aspects of this Code of Conduct. Business Partners are expected to promote the values included in this Code of Conduct within their organizations, and to train their respective employees and agents on specific policies and procedures needed to adhere to this Code of Conduct.

16. Compliance with this Policy

Business Partners shall comply with all applicable national and local laws and regulations, including laws and regulations relating to the provisions of this Code of Conduct. Where this Code of Conduct requires Business Partners to meet a higher

standard than set out by law or regulation, Business Partners shall meet such higher standards. Furthermore, violations of some provisions of this Code of Conduct are illegal and may subject individuals to civil and criminal liability. It is the expectation that all Business Partners perform the necessary self-audits to ensure they are in compliance with this Code of Conduct at all times. TPx shall have the right to audit Business Partners including, but not limited to, Business Partners' books and records for the purpose of verifying compliance under this Code of Conduct. Business Partners shall provide reasonable assistance in cooperating with all such audits. TPx may immediately terminate its business relationship (including any orders or other contracts) with a Business Partner without recourse if the Business Partner or its representatives fail to meet the standards set forth in this Code of Conduct. TPx may, in its sole discretion, require recertification of this Code of Conduct by a Business Partner throughout the term of any business dealings with the applicable Business Partner.

This Code of Conduct is in no way intended to conflict with or modify the terms and conditions of any existing contract. Instead, this Code of Conduct is intended to supplement any such contract terms. In the event of a conflict, Business Partners must first comply with all applicable laws and regulations, then the contract terms, followed by this Code of Conduct.

17. Reporting Violations of the Code of Conduct

Upon learning of any failure to comply with this Code of Conduct, Business Partners must report the non-compliance to TPx immediately. Business Partners can also submit questions and comments regarding the Code of Conduct by using TPx's Reporting system listed below:

Online: tpx.ethicspoint.com

Phone: 844-460-6605

Business Partners shall not retaliate or take disciplinary action against any worker who has, in good faith, reported violations or questionable behavior, or who has sought advice regarding this Code of Conduct.