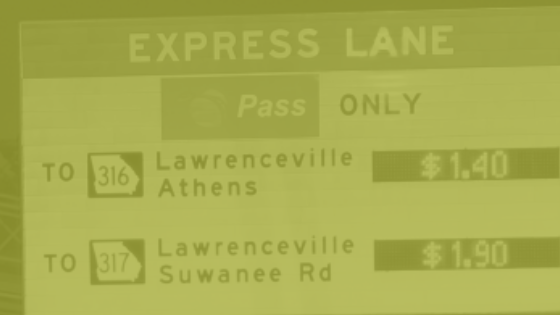


Electronic Transaction Consultants, LLC



ETC[®]



Code of Ethics

NOT SURE? ASK YOURSELF:

DOES IT REFLECT
OUR VALUES?

IS IT GOOD
FOR ETC
AND FOR MY
COWORKERS?

WOULD I
FEEL OKAY IF
EVERYONE KNEW
ABOUT IT?

IF YOU CAN ANSWER
“YES” TO ALL OF
THESE QUESTIONS, IT’S
PROBABLY SAFE TO
MOVE FORWARD. BUT A
“NO” OR “NOT SURE” TO
ANY OF THEM SHOULD
CAUSE YOU TO STOP
AND RECONSIDER. IT IS
ALWAYS APPROPRIATE —
IN ANY SITUATION, UNDER
ANY CIRCUMSTANCES —
TO ASK FOR HELP.



What if?

There is a conflict between what's in our Code of Ethics and the laws in the country where I work. I'm not sure what to do.

The best approach is to follow the stricter requirement, and if that's not clear, seek guidance from the Legal Department.



The ETC Code of Ethics ("ETC Code") reinforces the overarching principles of ETC and the U.S. legal environment. This ETC Code of Ethics applies to all directors, officers, employees, and contractors of Electronic Transaction Consultants, LLC ("ETC" or "Company"). Directors, officers, employees, and contractors must also be familiar with, and comply with the ETC Employee Handbook. We all must act with the highest level of ethics to ensure ETC meets or exceeds its obligations.

Know Your Responsibilities

Our good name is in your hands.

No matter what job you do or where you do it, you represent ETC. Think about that as you watch over every business relationship, every transaction and every product, and make sure your actions always reflect our values. Follow this Code of Ethics and any other policies as well as the laws and regulations of the country (or countries) where you work and protect what we've built. Complete your assigned training – it's the best way to stay up-to-date on what's expected of you.

If you see or suspect anything illegal or unethical, it may seem easier to look the other way or let someone else take the lead — but misconduct affects all of us. No concern is too minor to report. Share your concerns promptly and cooperate fully and honestly in any internal investigation. Be aware that anyone who violates this Code of Ethics or other policies may face corrective action, up to and including termination of employment with ETC.

If you manage people, you have an even greater responsibility. Lead by example, making sure your team members know this Code of Ethics is a resource for them and that there is no difference between what you do and what you expect from others. Create the kind of workplace where employees feel comfortable coming forward with questions and concerns; and support them when they raise issues.

We are committed to a respectful workplace, where we communicate honestly and openly with one another.



We do not retaliate

We don't tolerate retaliation. Never retaliate against employees for sharing concerns in good faith and prevent retaliation by others.



As a company we know it takes courage to come forward and share your concerns. We won't retaliate or permit retaliation against anyone who raises questions or concerns about corporate activities. We won't retaliate or permit retaliation against anyone who makes a good faith report about possible misconduct or legal violations to us or a government authority or assists in an investigation of misconduct or legal violation. Although coming forward will not immunize an employee from the consequences of his or her own misconduct, the employee's act of coming forward will be protected from retaliation and will be considered in determining disciplinary action.

Regardless of whom you contact, you can be confident that you're doing the right thing and that your concern will be handled promptly and appropriately. We investigate reports of misconduct thoroughly, disclosing information only to those who need-to-know, so that we can resolve the issue.

We Do Not Discriminate

ETC is committed to creating a working environment where all colleagues feel welcomed, in which diversity is accepted and valued, and where each employee is treated with fairness and respect.

The Company is committed to providing equal employment opportunities to all applicants for employment and to all employees on the basis of individual merit and personal qualifications and without regard to race, color, sex (including pregnancy), gender, sexual orientation, gender identity, gender expression, age, religion, national origin, citizenship, disability, genetic information, veteran status, military service, or any other characteristic protected by applicable federal, state, or local law or ordinance. This commitment applies to all aspects of employment, including, but not limited to, recruiting, hiring, placement, advancement, training, benefits, compensation, discipline and termination. This commitment also extends to providing reasonable accommodations to enable qualified individuals with a disability to perform the essential functions of their jobs. If you believe that you suffer from a disability and need an accommodation, please notify Human Resources.



Respect Our Business Partners

We value our business relationships and we work to be a good, responsible business partner.

Responsible sourcing is core to who we are and what we do, so work to ensure that business relationships we form are based on mutual respect and trust. Choose the right business partners and make decisions objectively, based on factors like quality, service, price, availability and reliability. Do your part to hold our suppliers to ETC's high standards and ensure they operate ethically, in compliance with the law and in a way that is consistent with this Code of Ethics, our policies and our values.

We also work with governments. Requirements under government contracts are often more restrictive than those of other contracts. In our government contracts, as with all our contracts, we follow the rules and never cut ethical corners. Whether you are involved in sales to the government, perform work for the government or are responsible for managing a government contract, always conduct business honestly, fairly and transparently. Comply and cooperate with government inspections, investigations or requests for information. If you are contacted by a government official, politely direct the individual to ETC's Legal Department. If you are responsible for helping respond to a government request, tell the truth. Never mislead anyone, impede their work or conceal, destroy or alter documents.



Scenario

A member of a government agency shows up to inspect a facility as part of providing us certain licenses we need in order to operate. What should I do?



Gather details about the inspection. Then, explain to the inspector that you will do what you can to ensure the Company responds to the request in a timely manner, contact the Legal Department, and wait for further instruction.

Always Remember:

If you are responsible for a supplier relationship:

- ◆ Follow our procurement, sourcing and due diligence processes and procedures.
- ◆ Make sure suppliers know about, and intend to comply with, our policies.
- ◆ Monitor contractual agreements to make sure that suppliers are meeting their obligations, and we're meeting ours.

If you're responsible for a government contract:

- ◆ Know and follow the unique legal requirements and restrictions that relate to this work.
- ◆ Protect any classified information or government-funded property associated with our contracts.
- ◆ Speak up about any activity that could put our government contracts at risk.

Promote procurement integrity. Never:

- ◆ Seek confidential or source selection information before a contract is awarded.
- ◆ Use other vendors' nonpublic bid or proposal information.
- ◆ Discuss employment or business opportunities with government procurement officials.

Make sure representations, reports and other information you submit on behalf of ETC are accurate and truthful.

We Never Bribe

We compete for business based on the quality of our products and services.

Do not offer bribes, accept bribes or let others bribe for you. Do everything you can to prevent bribery by others who conduct business on our behalf. Remember, a bribe can be something other than cash. A gift, favor or even an offer of a loan or a job could be considered a bribe if it's offered in exchange for a decision or business advantage. Because the law covers "anything of value," a bribe can be something other than cash. A gift, a

favor, an offer of a loan or a job for an individual or an individual's relative could be considered a bribe if it's offered in an attempt to secure a business advantage. Before offering anything of value, check ETC policies and ask questions about what's acceptable – and what's not. When in doubt, please seek guidance from the Legal Department.

US federal and state laws make it illegal to offer or give anything to a government official or government

employee in an effort to secure a business advantage.

In addition, the US Foreign Corrupt Practices Act ("FCPA") outlaws bribes and improper payments to foreign government officials.

The laws in some countries impose bigger penalties for bribing government officials than private, but for us, it's simple: bribery, of anyone at any organization at any level.

Scenario

A government employee asked if I can help his daughter get an internship at ETC. He says he can make it "worth my while."

This is a red flag — don't do it.

"Worth your while" suggests that the government official may be planning to do something improper in exchange for the favor. You can provide the government employee information about an internship and allow his daughter to apply as all other candidates do. Doing anything more than that could be viewed as a bribe.

ETC understands that a bribe can harm our reputation, but it's bigger than that. We know that acts of bribery and corruption can lead to unfair competition and unsafe products in the global marketplace and in the communities where we live and work. For us, a zero-tolerance policy on bribery is not just the lawful thing to do, it's the socially responsible thing to do.

Always Remember:

- ◆ Know a bribe when you see one. Ask the Company Compliance Officer if you're unsure.
- ◆ Follow the laws and requirements of the country (or countries) where you work. Avoid even the appearance of something inappropriate.
- ◆ Set clear expectations and actively monitor the work of third parties doing business on our behalf.
- ◆ Be accurate and complete in recording payments and expenses.
- ◆ Don't pay any kind of "facilitating" or "grease" payment (to obtain routine services from a government employee).
- ◆ Speak up if you see or suspect a bribe.



Know the Rules About Gifts and Entertainment

We don't give or receive anything that is inappropriate.

Business gifts and entertainment can be appropriate to foster goodwill, but can also create the appearance of partiality, or other impropriety. An occasional gift or offer of entertainment is often viewed as a normal part of doing business. However, sometimes even a well-intentioned gift or offer can cross the line. Any gift that creates a sense of obligation or compromises your professional judgment is always inappropriate.

That's why we have guidelines in place to identify the circumstances under which an offer is okay... and when it's not. Make sure you follow the rules and be aware of any special restrictions. For example, giving anything of value to a government official can be problematic. Always ask for help from the Legal Department if the right thing to do is unclear.

Exercise good judgment and moderation in providing or accepting business courtesies. Are you unsure about whether something is proper to offer or accept? Reach out to the Company Compliance Officer for help.



Scenario

I received a gift from a customer that I know I can't accept. What should I do?



Return the gift to the Customer and politely explain our policy. If the gift is something perishable, like flowers or a food basket, where return is not really an option, place it in a break room where it can be enjoyed by everyone.

One of our vendors offered me tickets to a concert that he cannot attend. Can I take them?



No. Even if the value of the tickets falls within the limits of our policy, the event doesn't offer an opportunity to enhance your relationship with the vendor or their company, since the vendor representative will not be attending with you.

What if one of our new vendors wants to say "hello" by sending everyone on my team a coupon and a free sample of their product? The vendor has asked me for a list of my coworkers' names and addresses? Is it okay to provide this information to the vendor?



Before doing anything, contact the Company Compliance Officer. Even if the intent behind the request is well-meaning, and even if your coworkers might like receiving the samples, supplying this information would violate our commitment to keeping private information private.

Always Remember:

Use good judgement. Turn down any offer if it is being given to influence a decision or if it would give the appearance of something improper, even if it is within the value limits that may be acceptable to the Company. Report this situation to the Legal Department.

Gifts or entertainment given or received should:

- ◆ Be nominal in value.
- ◆ Be infrequent.
- ◆ Satisfy a reasonable business purpose.
- ◆ Be consistent with acceptable business practices, given the industry and the geographic location.
- ◆ Be permitted by law and the policies of both the giver and receiver.
- ◆ Not reflect poorly on, or embarrass, ETC.
- ◆ Never be cash or a gift card, check, loan or stock.
- ◆ Be recorded accurately in our books and records.

Don't give anything of value to a government official without receiving approval in advance from the General Counsel.

Never ask anyone for a gift, meal or entertainment. If someone asks you – don't oblige.





Follow Import, Export and Trade Compliance Rules

We comply with the laws that govern global trade of our products and services.

As a United States-based company conducting business around the world, it's critical that we know and follow the international trade laws that regulate the import and export of our products. If you are involved in the movement of products, services, information or technology across international borders, make sure you know and comply with the requirements associated with the countries in which you do business – including data protection laws (i.e., EU General Data Protection Regulation or “GDPR”). Be aware that the laws of more than one country may apply. You should consult with the Legal Department for guidance.

We must carefully evaluate business opportunities within countries that are subject to U.S. trade embargoes or economic sanctions and strive to ensure that the strict regulations governing these markets are evaluated. We don't participate in, or promote, boycotts that the United States does not support.

Always Remember:

If you receive a request to participate in a boycott or are asked about ETC's position on a boycott, contact the Legal Department immediately. (It's equally important that you contact the Legal Department if you learn that one of our business partners may be participating in a boycott, because we expect them to comply with the laws of the U.S. and the countries in which they operate.)

If there appears to be a conflict between laws, customs or local practice, get help from the Legal Department.

Follow Antitrust and Competition Rules

Follow the antitrust and competition laws in the countries where we operate. Deal fairly with our customers, suppliers and competitors. Compete based on the quality and merit of our products and services.

Violations of antitrust and competition legislation are serious, and may be punishable by significant fines, or even prison.

Contacts with Competitors

Never discuss with our competitors, including at industry meetings or other venues, issues relating to: prices and pricing methods, margins, and discounts; products, marketing plans and strategies; production, industrial capacity, logistics, or product quality; market division by region, customer or discipline; financial information such as the cost of goods and services, profits, or margins; tenders, and the intention (or not) to bid for them; and agreements and contracts with suppliers or customers.

Scenario

What if I ran into an old college friend at a trade show who works for one of our competitors. She asked me how business was going. What should I do?



There is no problem with responding in a general, non-specific way to say that all is well, but keep your conversation high-level and be aware that simply having a conversation with a competitor can give the appearance to others of something improper.



We Do Business Fairly and Ethically



In the US, we prohibit agreements or discussions to boycott customers or suppliers; to exclude competitors or restrict trade in the marketplace; or to require a customer to buy a product that it does not want as a condition of a license or sale of a different product (“tying” of two products together). You are required to consult the Company Compliance Officer regarding any transaction that may implicate any anti-competitive behavior.

Always Remember:

Do not enter into any agreement with competitors that deprives, or appears to deprive, customers of the benefits of competition.

Never enter into any agreement or understanding whether formal or informal, with a competitor, customer or supplier to:

- ◆ Raise, set or hold (“fix”) prices on our products.
- ◆ Divide territories, markets or customers.
- ◆ Prevent another company from entering the market.
- ◆ Refuse to deal with a customer or supplier.
- ◆ Interfere with the competitive bidding process.
- ◆ Restrict production, sales or output.
- ◆ Force buyers to buy something they don’t want by tying it to something they do want.

Seek competitive information from public sources, such as news stories and trade journal articles.

Be fair, factual and complete in our advertising, sales and promotional materials.



We outperform our competition fairly and honestly. ETC believes in putting good products and services into the marketplace and letting free, fair and open competition drive success or failure. We don’t compromise our values and comply with laws designed to promote and preserve a competitive global market. We succeed based on our own merits and avoid any conduct that could restrict free trade.

Becoming aware of competitive information may be normal, based on your role or responsibility at ETC, but make sure you treat that information ethically and lawfully. Compete fairly, but vigorously, and never use deception or misrepresentation or abuse confidential information to gain an unfair advantage over our competitors. When you talk with customers, provide only truthful information about the quality, features and availability of our products, and don’t make disparaging remarks about our competitors.

Avoid Conflicts of Interest

We don't let personal interests affect business decisions we make on behalf of ETC.

A conflict of interest can happen anytime something you do outside of the workplace interferes with the work you do inside the workplace. It isn't possible to list every situation that could present a conflict, but there are certain situations where conflicts typically arise. And being able to recognize a potential conflict can help you avoid one.

When making decisions related to ETC, you have a duty to act in our company's best business interests and avoid even the appearance of a conflict. If you discover that a personal activity, investment, interest or association could compromise—or even appear to compromise—your objectivity or your ability to make impartial business decisions, disclose it immediately to your manager, HR or the Legal Department. Many conflicts can easily be avoided or addressed if they are promptly disclosed and properly managed.



What if?

I've been approached to sit on the Board of another company. Do I need to seek approval from someone at the company prior to accepting this position?

Yes. You should inform your manager and contact the Legal Department to review the situation and receive guidance on whether you can accept the position. Sometimes, participation on other companies' Boards may cause a conflict—we have to look at the type of company, the services it provides and any impact it may have on your responsibilities for ETC.



What to Look For

Know a potential conflict when you see one. A conflict can happen when:

- ◆ You supervise or conduct business with someone whom you have a close personal relationship.
- ◆ You invest in one of our suppliers, customers, business partners, or competitors.
- ◆ You own or do work for a company that competes, does business or wants to do business with ETC. Serving in an advisory role or on the board of directors for such a company can also pose a conflict.
- ◆ You use the ETC name or our property or information, without approval, to support a charitable, professional, or community organization.
- ◆ You take for yourself a business opportunity that is meant for ETC.

Remember, it's not possible to list every potential conflict of interest scenario; if you're not sure if a situation represents a conflict, ask the Legal Department.

Disclose to your manager and the Legal Department any actual or potential conflicts of interest or even situations that could suggest the appearance of a conflict.

Don't Trade on Insider Information

We recognize that trading based on material, nonpublic (or "inside") information is not only unfair, it's illegal.

As employees, officers, and directors of ETC, we may come into information about our company, or companies with which we work, that isn't known by the public but, if it was, might influence someone to buy, sell or hold stock. That knowledge makes us

"insiders," and trading on this "inside" information is against the law.

Know the kinds of information considered inside information. Examples include nonpublic information about mergers or acquisitions, sales or earnings results, financial forecasts, changes to the executive management team, pending lawsuits or major wins or losses.

Don't trade on inside information, and don't tip off others (including your family and friends) so they may trade. "Tipping" is also a violation of insider trading laws. If you're not sure if information is considered "inside" information, ask our Company Compliance Officer about it before trading on it. If you're not sure if information has been released to the public, treat it as though it hasn't been.

Scenario

I learned some information in a meeting with one of our suppliers that could affect some stock trades my brother-in-law is considering. Can I share what I know since it won't benefit me personally?



No. The law not only prohibits you from buying or selling stock based on material inside information, it also prohibits you from tipping off your brother-in-law (or anyone else) in order for him to trade.

Always Remember:

Don't trade on material inside information, and don't tip off others (including your family and friends) so they may trade. "Tipping" is also a violation of insider trading laws.

If you're not sure if information is considered "inside" information, ask the Legal Department about it before trading on it. If you're not sure if information has been released to the public, treat it as though it hasn't been.



We Do Not Harass

ETC is committed to providing a work environment that is free from harassment and intimidation of any person.

Employees and contractors are prohibited from acting in ways that could be construed as harassment or that could create a hostile, intimidating, or demeaning environment for other employees, applicants for employment, contractors or others with whom we interact in connection with our business. Harassment includes, but is not limited to, slurs or jokes, as well as abusive, demeaning, or derogatory comments, made about, or to, anyone. Sexual harassment may include displaying sexually suggestive material in the workplace, unwelcome flirting or advances, requests for sexual favors, or using offensive words or gestures of a sexual nature.

The focus of our commitment to providing a harassment-free work environment is on the effect of an individual's action, not the intent. If the actions of an individual have the effect of intimidating or demeaning others, it may be a violation of this Code of Ethics, even if the individual believes he or she was "just kidding around" or "didn't mean any harm." Any employee/contractor who believes that he or she has been subjected to, or has witnessed or been informed of, actions that may violate this section of the Code of Ethics or any ETC policy should promptly bring the matter to the Company's attention so that ETC may investigate the matter and take corrective action where appropriate. Employees/contractors can report any of these matters to the Company's Human Resources Department. Those who raise such concerns will be treated with courtesy and can be assured that the matter will be handled with discretion.



Scenario

In my country it's common to kiss hello, and not mean anything by it. Does that mean it's okay to kiss colleagues hello here, too?



No. It's good to be aware of differences in cultural expectations. While a kiss hello may be regarded as friendly in one country, it may be regarded as a sexual advance in another country. Keep in mind that individuals can perceive conduct as harassing even if you did not mean it to be – and when in doubt, don't make physical contact with co-workers.

We are having a birthday celebration for a colleague and a senior department member has suggested we go to a restaurant known for scantily-clad servers and provocative pictures on the walls. Is that OK?



No. Use good judgment, and when in doubt, ask yourself, "Does this reflect well on me? Does this reflect well on the Company? Would I be proud if people knew about my choice?"



Use Social Media Responsibly

You are responsible for the content you post online. Before creating online content, consider some of the risks and rewards that are involved.



Know and follow ETC's applicable policies:

The same principles and guidelines found in other Company policies apply to your activities online. Inappropriate postings that may include discriminatory remarks, harassment, threats of violence, or similar inappropriate or unlawful conduct will not be tolerated and may subject you to disciplinary action, up to and including termination of employment.

Be fair to others:

It is best to be fair and respectful to fellow employees, customers, suppliers, contractors and business partners. Also, keep in mind that you are more likely to resolve work-related complaints by speaking directly with your fellow employees or manager than by posting complaints to social media. Nevertheless, if you decide to post complaints or criticism, avoid using statements, photographs, videos, or audio that reasonably could be viewed as malicious, obscene, threatening or intimidating or that might constitute bullying, discrimination or harassment on the basis of race, color, sex (including pregnancy), gender, sexual orientation, gender identity, gender expression, age, religion, national origin, disability, or any other protected characteristic.

Be honest and accurate:

Make sure you are always honest and accurate when posting information or news, and if you make a mistake, correct it quickly. Be open about any previous posts you have altered. Don't lie.

ETC reserves the right to monitor social media content and take appropriate action in response to posts that violate this policy. Further, employees who violate this policy may be subject to disciplinary action, up to and including termination of employment.

Social Media

Use professional judgment:

In general, it is always wise to remember that what you say in social media can often be seen by anyone or an audience you may or may not have intended or approved to view such postings.

Respect confidentiality and intellectual property rights:

Do not disclose ETC's Confidential Information (as defined below) not otherwise available to persons or entities outside the Company. Respect intellectual property. For the Company's protection, as well as your own, it is critical that you show respect for the laws governing intellectual property (copyright, patent, trademark, service mark or other trade secrets), and laws governing fair use of intellectual property owned by others, including ETC's own intellectual property.

Be transparent:

Do not create a social media account to speak on behalf of ETC or represent yourself as a spokesperson for ETC. If the Company is a subject of the content you are creating or posting, or you publish content related to the work you do, or subjects associated with the Company, do not create the impression that you are speaking on behalf of the Company. For example, you include a disclaimer such as, "The postings on this site are my own and do not necessarily reflect the views of Electronic Transaction Consultants, LLC." Similarly, do not create an online group related to the Company or Company business.

Scenario

If I use an anonymous social media account, can I use it to share negative gossip about our competitors?



No. First, you should only post things that are honest and accurate. Second, never count on staying "anonymous" on social media. Third, when you do post you should be transparent and accurate, identifying yourself and making clear whether or not you are authorized to speak on behalf of ETC.



We Protect Health and Safety

We are committed to protecting one another, and the Company.

We look out for each other. We follow our safety procedures and promote a culture of safety, because our people are our greatest asset. Every employee is empowered to take immediate action for the safety of our employees regardless of role, title or responsibility. If you see a situation that could put others at risk – take action; and, at all times and in all places – work to keep yourself and your coworkers injury-free.

Observe a zero-tolerance policy when it comes to acts or threats of violence. Be alert to what is going on around you, observe good security practices and speak up about any threats of potential violence. We prohibit weapons in the Company's offices, consistent with local law — if you have concerns that someone may have a weapon on premises, report it immediately to the Company Compliance Officer. Having, using or distributing illegal drugs is also prohibited by our Drug and Alcohol-Free Workplace Policy because substance abuse can impair your judgment, your performance and the safety of those who work with you.

Scenario

There's a plumbing leak and now electrical equipment is sitting in water, but it's not in my department. Do I really need to do something about that?

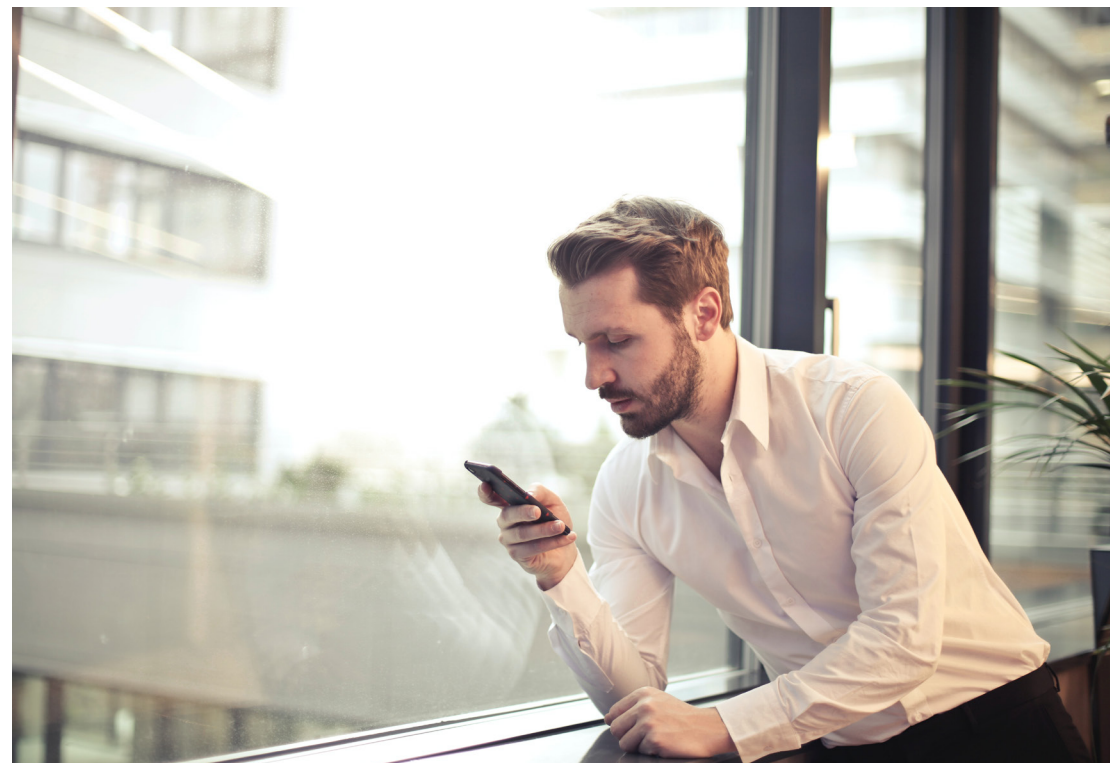


Yes! Speak up. Everyone is empowered to address safety issues, whether or not it's in your department, and ignoring a dangerous condition doesn't keep anyone safe.

I think a colleague is being stalked by a former partner. My co-worker hasn't said anything directly to me, and I don't want to offend them, but I think something is wrong.



Reach out to Human Resources, or, if you don't want to identify yourself, call the Hotline. We are committed to taking steps to keep our staff safe while at work.





People trust us to protect their personal information. We respect the privacy of our consumers, our customers, our co-workers and others with whom we conduct business, and we handle their personal information with care. "Personal information" is any information that could be used to identify someone, either directly or indirectly, such as a name, employee ID, social security numbers, email address or phone number. There are data privacy laws that prescribe how to responsibly collect, store, use, share, transfer and dispose of personal information, and we strive to comply with those laws everywhere we operate.

Follow our policies and protect any personal information that is entrusted to you. Use it only in the way it's meant to be used and don't share it with anyone inside or outside of the company in an unauthorized manner.

Practice good cybersecurity, too. Make sure you follow the processes and practices we have in place to protect our networks, computers, programs and data from attack, damage or unauthorized access.

- ◆ Know the kinds of information considered "personal information."
- ◆ Follow the privacy laws and regulations of the country or countries in which you work.
- ◆ Safeguard personal and personnel information from unauthorized disclosure. Report any breaches immediately to our IT Department.

Confidential Information

Disclosing confidential information outside of our Company could hurt our ability to compete in the marketplace and could damage our customers and our employees. Everyone at the Company is responsible for protecting our confidential information, including by only discussing confidential matters in secure settings, protecting data from unauthorized access, securing your work-provided laptops and mobile phone, and disposing of confidential data properly. If you are not sure whether something is confidential information or not, contact the Legal Department.

We Cooperate with Government Investigations

We cooperate fully and honestly with governmental, third-party or internal investigations and audits. Employees must cooperate fully, and not withhold or give false or misleading information. Never alter or destroy records in response to, or in anticipation of, an investigation or audit. Any time you learn of a government or law enforcement investigation regarding the Company, or an official comes to your work location to conduct an investigation, contact the Company Compliance Officer immediately.

Know where to go for help

There are people ready to support you.

Have a question, problem or a concern? In most cases, your manager should be your first point of contact. He or she is likely in the best position to understand your concern and take the appropriate action. If you're uncomfortable speaking with your manager, or if you have already shared a concern and feel it's not being addressed appropriately, reach out to HR or another member of management or one of the following:

Legal Department - Company Compliance Officer

address: 1600 N. Collins Blvd., Suite 4000, Richardson, TX 75080
phone: 214-442-7298
email: compliance_officer@etcc.com

Human Resources

address: 1600 N. Collins Blvd., Suite 4000, Richardson, TX 75080
phone: 214-615-2302
email: TalentServices@etcc.com

Nothing in this Code of Ethics prohibits you from communicating with government agencies about possible violations of federal, state, or local laws or otherwise providing information to government agencies, filing a complaint with government agencies, or participating in government agency investigations or proceedings, and this Code of Ethics does not require you to notify ETC of any such communications.

Additionally, nothing in this Code of Ethics or in any of our policies is intended to limit or interfere with the right to engage in concerted activities protected under Section 7 of the National Labor Relations Act, such as discussions related to wages, hours, working conditions, health hazards and safety issues.

We are here for you and we are committed to fair play. We abide by all applicable laws and work to avoid even the appearance of impropriety.

When we raise integrity concerns, we make our Company stronger and protect our colleagues from harm. You do not need to be certain that a violation has occurred. At the same time, you have an obligation to promptly raise a concern when you see a situation in which our principles or policies are not being followed. Confidentiality is respected, and you may even choose to remain anonymous. However, if you identify yourself, we are able to follow-up with you and provide feedback. Your identity and information will only be shared on a "need-to-know" basis. Any retaliation — whether direct or indirect — against employees who raise a good-faith concern is grounds for discipline up to and including dismissal.



Scenario

I suspect, but am not certain, that someone is violating this Code of Ethics and policies. Should I keep my concerns to myself?



No. If you suspect a violation, say something. It's better to raise a potential problem than to wait and risk harm to others or to the Company. Reporting "in good faith" means you are coming forward honestly with information that you believe to be true, even if, after investigation, it turns out that you were mistaken.

Culturally, it's not common to report a concern about someone that is in a leadership position. What should I do?



It's important to say something about your concerns. ETC respects its diverse workforce, considers various cultural norms when looking into concerns and takes all appropriate actions to protect the identity of the person who is sharing the information, as well as the information that's being shared.



The Hotline is also a resource available to you

Operated by an independent reporting service, you may contact the Hotline anytime, via phone or internet portal, to speak up with questions or allegations of violations of this Code of Ethics or ETC's policies, procedures, and the law. You may submit a report confidentially.

Report by Phone: 1-844-673-8333

Report by Internet: www.etcc.ethicspoint.com

When you contact the Hotline — whether by phone or internet — a web-based form will document the information you share, and it will be released to the company to ensure that the individuals with the appropriate expertise can effectively respond to the question or concern. Rest assured, ETC takes this process very seriously and will strive to maintain the confidential nature of your submission. After reporting your question or concern, you will receive a case number that will be your reference, should you want to check back in and receive status updates regarding your submission.