

Eight 32 Group, LLC

Office of Corporate Management
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Eight 32 Group, LLC Standards of Business Conduct

Culture and Values

Eight 32 Group, LLC conducts business ethically, honestly and in full compliance with applicable laws and regulations.

Our Mission - Empowerment Made Possible

Our Values - Integrity, Honesty, Respect, Confidentiality and Compliance.

To achieve our mission, we must build trust with people and organizations. Our goals can only be achieved when people have trust and confidence in Eight 32 Group, LLC and our services. We gain credibility by adhering to our commitments, displaying honesty and integrity and reaching company goals solely through honorable conduct. It is easy to say what we must do, but the proof is in our actions. Ultimately, we are judged on what we do.

Responsibilities

Eight 32 Group, LLC's Standards of Business Conduct apply to all employees, independent contractors, consultants and any others in business with Eight 32 Group, LLC.

Follow the Standards of Business Conduct, Report Behavior Not In Line With Our Standards, Exercise Good Judgement, Ask Questions, Take Responsibility For Your Own Actions

Failure to comply with Eight 32 Group, LLC's Business Conducts Standards may result in disciplinary action up to and including termination of employment or ending the working relationship with Eight 32 Group, LLC.

Reporting Concerns

To build a culture of trust we must speak up about any concerns. Eight 32 Group, LLC will listen to concerns seriously, fairly and promptly. Eight 32 Group, LLC will not retaliate or tolerate retaliation for reported concerns. No adverse consequences will be enforced for not doing something that violates our Standards of Business Conduct or the law, reporting concerns in good faith and/or cooperating with an investigation. You should raise any concerns to your manager, any Eight 32 Group, LLC Manager or member of the Human Resources Department.

Set Tone at the Top

Eight 32 Group, LLC's leadership team has the added responsibility for demonstrating, through their actions, the importance of these Standards. In any business, ethical behavior does not simply happen; it is the product of clear and direct communication of behavioral expectations, modeled from the top and demonstrated by example. Again, ultimately, our actions are what matters.

The leadership team is responsible for promptly addressing ethical questions or concerns raised by employees and for taking the appropriate actions to deal with such issues. Managers should not consider

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employees' ethical concerns as threats or challenges to their authority, but rather as another encouraged form of business communication.

Uphold the Law

Eight 32 Group, LLC's commitment to integrity begins with complying with laws, rules and regulations where we do business. Further, each of us must have an understanding of the company policies, laws, rules and regulations that apply to our specific roles. If we are unsure of whether a contemplated action is permitted by law or Eight 32 Group, LLC policy, we seek the advice from the resource expert. We are responsible for preventing violations of law and for speaking up if we see possible violations.

Non-Disclosure/Confidentiality Agreements

When doing business with a client, supplier, vendor or other third party, confidential information should never be shared without approval from Eight 32 Group, LLC Management. Confidential information should never be shared outside of Eight 32 Group, LLC without a fully executed non-disclosure/confidentiality agreement. Original copies of non-disclosure agreements must be correctly filed with Eight 32 Group, LLC's HR team. Always limit the amount of confidential information share to the minimum necessary to address the business need.

Proprietary Information

It is important that we respect the property rights of others. We will not acquire or seek to acquire improper means of a competitor's trade secrets or other proprietary or confidential information. We will not engage in unauthorized use, copying, distribution or alteration of software or other intellectual property.

Competition

We are dedicated to ethical, fair and vigorous competition. We will deliver products and services based on their merit, superior quality, functionality and competitive pricing. We will make independent pricing and marketing decisions and will not improperly cooperate or coordinate our activities with our competitors. We will not offer or solicit improper payments or gratuities in connection with the purchase of goods or services for Eight 32 Group, LLC or the sales of its products or services, nor will we engage or assist in unlawful boycotts.

Conflicts of Interest

We avoid any relationship or activity that might impair, or even appear to impair, our ability to make objective and fair decisions when performing our jobs. At times, we may be faced with situations where the business actions we take on behalf of Eight 32 Group, LLC may conflict with our own personal or family interests. We owe a duty to Eight 32 Group, LLC to advance its legitimate interests when the opportunity to do so arises. We must never use Eight 32 Group property or information for personal gain or personally take for ourselves any opportunity that is discovered through our position with Eight 32 Group, LLC.

Here are some other ways in which conflicts of interest could arise:

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1. Being employed (you or a close family member) by, or acting as a consultant to, a competitor or potential competitor, supplier or contractor, regardless of the nature of the employment, while you are employed with Eight 32 Group, LLC.
2. Hiring or supervising family members or closely related persons.
3. Serving as a board member for an outside commercial company or organization.
4. Owning or having a substantial interest in a competitor, supplier or contractor.
5. Having a personal interest, financial interest or potential gain in any Eight 32 Group, LLC transaction.
6. Placing company business with a firm owned or controlled by an Eight 32 Group, LLC employee or his or her family.
7. Accepting gifts, discounts, favors or services from a customer/potential customer, competitor or supplier, unless equally available to all Eight 32 Group, LLC employees.

Determining whether a conflict of interest exists is not always easy to do. Employees with a conflict of interest question should seek advice from management. Before engaging in any activity, transaction or relationship that might give rise to a conflict of interest, employees must seek review from their managers or the HR department.

Gifts, Gratuities and Business Courtesies

Eight 32 Group, LLC is committed to competing solely on the merit of our products and services. We should avoid any actions that create a perception that favorable treatment of outside entities by Eight 32 Group, LLC was sought, received or given in exchange for personal business courtesies. Business courtesies include gifts, gratuities, meals, refreshments, entertainment or other benefits from persons or companies with whom Eight 32 Group, LLC does or may do business. We will neither give nor accept business courtesies that constitute, or could reasonably be perceived as constituting, unfair business inducements that would violate law, regulation or policies of Eight 32 Group, LLC or customers or would cause embarrassment or reflect negatively on Eight 32 Group, LLC's reputation.

Accurate Public Disclosures

All disclosures made in financial reports and public documents are full, fair, accurate, timely and understandable. This obligation applies to all employees, including all financial executives, with any responsibility for the preparation for such reports, including drafting, reviewing and signing or certifying the information contained therein. No business goal of any kind is ever an excuse for misrepresenting facts or falsifying records.

Employees should inform the Leadership and Management teams and the HR department if they learn that information in any filing or public communication was untrue or misleading at the time it was made or if subsequent information would affect a similar future filing or public communication.

Corporate Recordkeeping

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We create, retain and dispose of our company records as part of our normal course of business in compliance with all Eight 32 Group, LLC policies and guidelines, as well as all regulatory and legal requirements.

All corporate records must be true, accurate and complete, and company data must be promptly and accurately entered in accordance with Eight 32 Group, LLC and other applicable accounting principles.

We must not improperly influence, manipulate or mislead any unauthorized audit, nor interfere with any auditor engaged to perform an internal independent audit of Eight 32 Group, LLC's books, records, processes or internal controls.

Promote Substance Over Form

At times, we are all faced with decisions we would rather not have to make and issues we would prefer to avoid. Sometimes, we hope that if we avoid confronting a problem, it will simply go away.

At Eight 32 Group, LLC, we must have the courage to tackle tough decisions and make difficult choices, secure in the knowledge that Eight 32 Group, LLC is committed to doing the right thing. At times this will mean doing more than simply what the law requires. Merely because we can pursue a course of action does not mean we should do so.

Although Eight 32 Group, LLC's guiding principles cannot address every issue or provide answers to every dilemma, they can define the spirit in which we intend to do business and should guide us in our daily conduct.

Accountability

Each of us is responsible for knowing and adhering to the Standards of Business Conduct and for raising questions if we are uncertain about company policy. If we are concerned whether the Standards are being met or are aware of violations of the Standard, we must contact the HR department immediately.

Eight 32 Group, LLC takes these Standards seriously and violations are cause for disciplinary action up to and including termination of employment.

Use of Company Resources

Company resources, including time, materials, equipment and information, are provided for company business use. Nonetheless, occasional personal use is permissible if it does not affect job performance or cause a disruption to the workplace.

Employees and those who represent Eight 32 Group, LLC are trusted to behave responsibly and use good judgment to conserve company resources. Managers are responsible for the resources assigned to their departments and are empowered to resolve issues concerning their proper use.

Generally, we will not use company equipment such as computers, copiers and fax machines in the conduct of an outside business or in support of any religious, political or other outside daily activity, except

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for company-requested support to nonprofit organizations. We will not solicit contributions nor distribute non-work related materials during work hours.

In order to protect the interests of the Eight 32 Group, LLC network and our fellow employees, Eight 32 Group, LLC reserves the right to monitor or review all data and information contained on an employee's company-issued computer or electronic device, the use of the Internet or Eight 32 Group, LLC's intranet. We will not tolerate the use of company resources to create, access, store, print, solicit or send any materials that are harassing, threatening, abusive, sexually explicit or otherwise offensive or inappropriate.

Questions about the proper use of company resources should be directed to your manager.

Contact

Katrina Hamilton, Human Resources & Administrative Coordinator

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