



Round Room Code of Conduct

Round Room and its Member Companies, Employees, and Contractors (“Company”) care that members of our diverse business family feel safe and included. We are at our best when we follow high standards of ethical conduct and authentically welcome and celebrate the communities and cultures that drive our business. We are inspired to be better together.

In support of this mission, Round Room has formally established the following Code of Conduct.

A Company with a Culture of Good

Round Room was built on the premise that by letting our Employees bring their souls to work, we unleash results. Our Employees have permission to care – we care about each other, our customers, and our communities. We will drive the business to greater success so that we can do more good in the communities where we live and whom we serve.

Persons Covered Under This Code

This Code applies to all full and part time Employees, Contractors, and Vendors within the Companies. All are required to be aware of and conduct their activities in accordance with this Code. Any failure to comply with this Code, its supporting policies, or the laws and regulations of the country/state in which we work or do business will be fully investigated, and appropriate action will be taken. This may include retraining, discipline, or termination of employment or a contract.

Expectations

Each person covered by this Code is important to the success of the Company. We expect these individuals to:

- Treat coworkers and each other with respect and dignity;
- Work safely;
- Follow the Company policies and procedures;
- Follow this Code; and
- Abstain from abusive language and/or reckless behavior.

Employment Values (Equity, Diversity and Inclusion)

We will connect with the people around us as the Company is committed to attracting, developing and retaining a highly qualified, diverse, and dedicated work force. Our policy is compliant with all laws providing equal access and opportunity to all persons without regard to race, color, religion, age, gender, sexual orientation, gender identity and expression, national origin, disability, marital status, citizenship status, veteran status, military status or any other protected category under applicable law.

Ethics Line

We are passionate about creating a culture that inspires, welcomes, and motivates our Employees. Therefore, we also protect our culture which allows our Employees the opportunity to bring forward any concerns or complaints and have those issues addressed with a sense of importance and urgency.

The Company requires any Employee, Contractor, or Vendor who reasonably suspects a material violation of any law, rule, regulation or Company guideline to report the suspicion to HR, Compliance, or through the Ethics Line.

The Ethics Line may be reached anonymously by either calling 855-799-8301 or by submitting a report at roundroom.ethicspoint.com.

All Employees can report true and factual allegations without concern of retaliation. We will be authentic in our words and actions.

Authentic Leadership

We lead by example and encourage all team members to do the right thing in the right way at the right time. We will inspire others to join us in doing good. In this way, we strive to meet our high ethical standards of business conduct.

Safe Workplace

Social responsibility is very important to our business – we care about the people around us. The Company is committed to providing a healthy and safe working environment free of intimidation, threatening speech or behavior, threats of harm, or violence, whether engaged in by another Employee, Customer or a Vendor.

Substance Abuse

The Company will not accept the risk in the workplace that substance use or abuse may create. Therefore, you may not use any type or form of marijuana and/or any illegal drugs on the job, work under the influence of drugs or alcohol, possess, distribute or sell drugs in the workplace, or drink alcohol on the job.

Confidentiality

We protect and respect the confidentiality of our customer data and their Verizon accounts. Employee and Vendor data is also confidential. Business information should not be discussed with anyone outside the Company except as may be required in the normal course of business.

Responsible Social Networking

Employees should be aware that online activity is not always private. Professional contacts may be able to access personal information on sites such as Facebook, LinkedIn, and Twitter etc. Disparaging and/or derogatory statements made by employees while representing the Company's interests, even outside the workplace, is governed by the Company's Social Media Policy.

Sales Practices

We strive for accurate and honest communications with each other and our customers, at all times. Our Company will earn loyalty by being partners and by doing good in the communities we serve.

Conflict of Interest

Exist when a personal interest or activity interferes with an Employee's job duties and/or business activities. Potential conflict must be disclosed to HR or Compliance.

Supporting Policies

Each member company will have its own Policy & Procedures as it relates to their Employees, Customers, and Vendors etc. Please reach out to the Human Resources or Operations department at your Company for more details.

Ethics & Compliance Program

The Company's Ethics and Compliance program was established to formally educate our Employees and member companies about the law, regulations, policies, and procedures governing our activities. We encourage the identification, communication, and correction of compliance issues to ensure that all our activities are ethical and legally compliant with integrity. The Company maintains a Compliance Officer who is responsible for oversight of the Ethics and Compliance program.

Compliance Officer: compliance@roundroom.com

Ethics Line: roundroom.ethicspoint.com and 855-799-8301