



## Policy

Qualfon Group, which includes all of its affiliated entities (collectively referred to herein as “Qualfon”) complies with all applicable laws and regulations and expects all directors, officers and employees to conduct business in the same manner. All directors, officers and employees shall refrain from any illegal, fraudulent or unethical conduct and avoid any actions that might give the appearance of impropriety.

## Statement of Core Values

Qualfon’s Mission

**“Be the best and make each person’s life better.”**

Qualfon invests in the well-being of it’s people who, in return, are taking better care of customers, clients, and communities.

Qualfon’s Values

Qualfon offers a values-centered environment. The core values known as **STRIDES**:

- **Service** – Treating people the way employees would want to be treated
- **Teamwork** – Working effectively in collaboration with others
- **Results** – Working to exceed the employee’s own expectations
- **Integrity** – Being trustworthy
- **Dignity** – Respecting the employee’s self and others
- **Encouragement** – Doing the very best, and by example leading others
- **Spirituality** – Embracing the employee’s personal beliefs for him or herself

## Procedures

The use of good judgment and ethical principles shall guide all Qualfon employees to conduct themselves following the highest possible standards of ethical business conduct. If a situation arises where it is difficult to determine the proper course of action, the matter should be discussed immediately with the employee’s supervisor and if necessary communicated to the Person Office for further direction. Employees who have a concern that they may be observing unethical or illegal conduct by other employees, clients or suppliers must consult their supervisors, the Person Office or follow the reporting process set out below.

## Successful Working Relationships

Qualfon is proud of the strong personal commitment that its directors, officers and employees have made and Qualfon relies on the excellence in achievement that results from that commitment. But this level of commitment can only be achieved in a climate of trust and mutual respect. All dealings with fellow employees—peers, subordinates, and supervisors—should be conducted as a partnership, in which actions are governed by an overriding commitment to



Qualfon's success. Working in partnership and focusing on mutual objectives are the driving momentum behind Qualfon's current and future success.

## Standards of Conduct:

Qualfon's ethical standards help maintain its leadership position in the market and its quality image and reputation.

Employees shall:

- Conduct themselves professionally and comply with all policies and work rules.
- Communicate openly with management and other employees.
- Assume responsibility for their actions.
- Comply with all laws, including, but not limited to Telemarketing Laws, Antitrust Laws, False Claims Acts, Anti-Kickback Statutes, HIPAA, HITECH and any other laws or regulations governing the business.

Qualfon's primary product is service, and thus, the most important asset is its people. Qualfon relies on each employee to exercise good judgment and common sense during their job performance.

## Rules of Behavior:

Qualfon is committed to doing business and operating in an ethical manner, and violations of these ethical principles will be dealt with firmly. Below are some examples of improper conduct that will result in appropriate disciplinary action, up to and including termination. This list is NOT all-inclusive. Please use common sense and good judgment.

- Lying on or falsification of employment application information, personnel records, official reports, time cards (personal and other employees' time cards), payroll records, leave of absence, sick pay or bereavement requests.
- Abusive conduct or language, or insulting action toward co-workers, vendors or clients.
- Shoving or physical rough-housing.
- Threats of violence or physical fighting at any time directed toward anyone, including vendors, fellow workers, clients or any other persons on Company property.
- Any actions which violate the Company's equal opportunity or harassment policies or other policies.
- Failure to be aware of and/or respect the policies of potential or actual clients, whether private or governmental.
- Acts which reflect a lack of commitment to quality in work, such as neglect of duty, sleeping on duty, overuse of cell phones for personal reasons, failing to timely clock in or out or excessive absenteeism or tardiness.
- Remaining on or entering Company facilities during non-business hours unless on official business with management approval. Allowing an unauthorized person into a Qualfon facility during non-business hours or into unauthorized locations within these facilities.
- Engaging in employment for a competitor of Qualfon without prior review and approval from a member of the Executive Team.
- Submitting false, incomplete or misleading information on a proposal, quotation or other document submitted to a potential or actual client.
- Failure to report wages when claiming unemployment.



- Theft of any kind or for any value, pilfering or misappropriation of any Qualfon property, client property, found property, other employees' property or recovered stolen property.
- Malicious or deliberate destruction of Qualfon property, client property or fellow workers' property, or any damage to such property resulting from gross negligence or sabotage.
- Unauthorized possession of Company keys or duplication of such keys without prior authorization from facility management.
- Any violation of Qualfon's Drug Free Workplace policy.
- Unauthorized disclosure or use of confidential information, including trade secrets or proprietary business information of Qualfon or any of its clients or suppliers.
- Bribery or extortion.
- Possession of firearms or weapons of any kind, including concealed weapons on Company property.
- Any violation of Qualfon's Social Media Policy.
- Failure to report crimes, violations of the Code of Conduct or other serious incidents relating to Qualfon or its employees or clients.
- Unauthorized alteration or falsification of records (including, but not limited to client's customer records or Company records).
- Computer-related activity involving unauthorized alteration, destruction, forgery, manipulation of any data (including, but not limited to a client's customers data).

### Prohibition on Conflicts of Interest:

A conflict of interest exists when an employee has a relationship with an entity or individual that may affect the employee's ability to make impartial business decisions on behalf of Qualfon. It is the responsibility of each employee to disclose and avoid any potential or actual conflicts of interest as well as the appearance of impropriety. Employees who violate this policy may be subject to appropriate corrective action, up to and including termination. The following are some examples of actions prohibited by this policy. This list is NOT all-inclusive. Please use common sense and good judgment.

- Offering or giving any form of compensation, reward, kickback or gratuity as well as a significant gift or favor intended to induce or reward favorable buying decisions or governmental actions.
- Accepting any form of compensation, reward, kickback or gratuity as well as a significant gift or favor from any person involved in supplying goods or services to Qualfon or from a past, potential or current client.
- Rendering services for, or entering into a commercial business transaction with, a competitor or a similarly situated business without the prior approval of two Executive Team members.
- Soliciting or entering into any commercial business transaction with Qualfon's suppliers, licensees or past, potential or current clients in order to compete with Qualfon or where doing so may reasonably be expected to interfere with the Qualfon's relationship with such entities.
- Soliciting clients or vendors for free or discounted merchandise, services, gifts or gratuities.
- Offering any government official any type of gift, merchandise, free service or gratuity.



## Protecting Qualfon Confidential Information

Any access to confidential information about Qualfon—such as new business strategies, potential transactions, new clients or prospects, unannounced earnings or prospective new services, methodologies or business processes that have not been disclosed to the public—will not be disclosed to others.

### *Fair Dealing*

In Qualfon's interactions with clients, their customers, or competitors, - directors, officers and employees will strive to act with integrity and honesty. No director, officer or employee may take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair dealing or practice.

### *Providing Quality Services*

Qualfon will provide services that meet or exceed clients' expectations for quality, integrity, and reliability, and will strive to satisfy requirements while acting in the best interest of Qualfon.

### *Seeking Business Openly and Honestly*

Qualfon strictly prohibits bribes, kickbacks, or any other form of improper payment, direct or indirect, to any representative of any government, any client, or any supplier in order to obtain a contract, some other commercial benefit, or government action. Qualfon also strictly prohibits any employee from accepting such payments from anyone.

Qualfon will not offer any existing or potential client gifts or favors of more than a nominal value. Reasonable business entertainment is permitted, including promotional events, as long as what is offered is consistent with usual business practice, is not intended as a bribe or a payoff, is not in violation of any law, and will not embarrass Qualfon or its employees if disclosed publicly.

### *Maintaining Confidentiality of Customer Information*

Qualfon will keep all personally identifiable information relating to our clients' customers, or potential clients, confidential. We will comply with all Qualfon policies and procedures with respect to the use, storage, reproduction, communication and disclosure of client information and all applicable federal, state, and local laws and regulations.

### *Respecting the Secrets and Confidentiality of Others*

Qualfon respect the patents, trademarks, and copyrights of others, including Qualfon's clients, and will not knowingly infringe these intellectual property rights. Qualfon also respects the trade secrets and proprietary information of others. This may include the trade secrets and proprietary information of former employers.

### *Antitrust Matters*

Qualfon will comply with the United States antitrust laws and the corresponding laws of other nations where we do business. Among other things, these laws prohibit any formal or informal understanding, agreement, plan, or scheme among competitors, which involves prices, territories, market share, or clients to be served.



## Reporting and Anti-Retaliation Policy:

### *Qualfon Encourages A 'Speak Up' Culture*

Choosing to speak up about workplace concerns helps build a healthy, ethical, and compliant company and is part of Qualfon's culture. If a director, officer or employee observes any form of fraud, waste, abuse or behavior that may violate this policy, they must promptly report it. It is the intent of Qualfon to provide an effective and confidential process for employees to report potential violations or incidents without retaliation or intimidation, in accordance with applicable laws and regulations. Qualfon's people are the most valuable asset. It benefits all of Qualfon when concerns are raised so that Qualfon may carefully consider and properly address any issues or concerns.

### *Employees Should Follow Qualfon's Commitment to our Code of Conduct and the Law*

The Company is deeply committed to promoting a culture of ethical conduct and compliance with:

- Our Code of Conduct, Core Values, Strides and policies;
- The laws, rules, and regulations that govern our business and our operations; and
- Best practices in accounting, auditing and financial reporting matters.

Qualfon expects all of directors, offices and employees, to follow this commitment in all aspects of work.

### *Employees Should Raise Questions and Good Faith Concerns About Conduct That May Violate Qualfon's Code*

Consistent with Qualfon's commitment to ethics, compliance, and the law, Qualfon welcomes questions and good faith concerns about any conduct believed to violate the Code of Conduct, especially conduct that may be illegal, fraudulent, noncompliant, unethical, or retaliatory.

Qualfon promotes an environment that fosters honest, good faith communications about matters of conduct related to business activities - whether that conduct occurs within Qualfon, involves a Qualfon's contractor, supplier, consultant, or client, or involves any other party with a business relationship with Qualfon.

### *Qualfon Does Not Tolerate Retaliation*

Coming forward with questions or concerns may sometimes feel like a difficult decision, but Qualfon is committed to fostering an environment that does not deter individuals from speaking up when conduct is observed that may violate the Code of Conduct. Qualfon will not tolerate retaliation of any kind against an employee because the employee raises a question or good faith concern about a violation or suspected violation of the Code of Conduct, Qualfon policies, the laws and regulations under which Qualfon does business, or because an employee participates or cooperates in an investigation of such concerns. "Good faith" does not mean that a reported concern must be correct, but it does require that a director, officer or employee is truthful when reporting the concern or violation.

Retaliation is any conduct that would reasonably dissuade an employee from raising, reporting or communicating about good faith concerns through Qualfon's internal reporting channels, with any governmental authority/agency, or from participating in or cooperating with an investigation and/or legal proceeding due to raising the concern. Retaliation may occur through conduct or written communication and may take many forms, including actual or implied threats, verbal or nonverbal behaviors, changes to the terms or conditions of employment, coercion, bullying, intimidation, or deliberate exclusionary behaviors.



The following are examples of potential retaliation Qualfon prohibits:

- Adverse employment action affecting an employee’s duties, responsibilities, salary or any other compensation;
- Demotion, suspension, or termination of employment;
- Removing opportunities for advancement;
- Excluding an employee from important meetings;
- Threatening an employee who has made a report;
- Directing an employee who has made a report not to report to outside regulators;
- Deliberately rude or hostile behaviors or speech; and
- Creating or allowing the creation of a work atmosphere that is hostile toward an employee who has reported a concern.

It is Qualfon’s policy to adhere to all applicable laws protecting our employees against unlawful retaliation or discrimination as a result of raising questions or good faith concerns.

### *How to Raise Questions and Concerns*

Employees can submit their questions or concerns about conduct they believe may violate the Code of Conduct, Qualfon’s policies or the laws and regulations under which Qualfon does business to:

- Your supervisor or manager;
- Any Qualfon leader;
- The Person Office;
- Legal / Compliance;
- The Chief Compliance Officer / Chief Legal Officer;
- The anonymous and confidential Ethics Hotline (see below).

When an employee raises a concern, Qualfon will maintain confidentiality to the fullest extent possible, consistent with applicable legal requirements and the need to conduct an adequate investigation or review.

Ways to report potential issues:

- **Internal Hotlines:**

Canada	1-844-787-0480
Colombia	01-800-5189732
Costa Rica	800-460-0026
Guyana, South America	159 At the English prompt dial 844-787-0480
India	022 5097 2968
Mexico	8008721149
Philippines	02 8540 1337
USA	1-844-787-0480



- **Website:** [qualfon.ethicspoint.com](http://qualfon.ethicspoint.com)
- **Email:** Compliance@Qualfon.com

The hotlines, website, and e-mail operate 24 hours a day, 7 days a week, 365 days a year. An employee may submit anonymously and leave necessary information. Though it is not required, an employee is encouraged to leave his or her name to facilitate communication if additional information is needed.+

- **In Person:** Chief Compliance Officer, Compliance Director or Any Member of Management

When raising concerns, Qualfon asks that employees provide as much detailed information as possible, including the background and history of the concern, names, dates and places where possible, and the reasons why the situation is cause for concern. This is especially important for concerns raised anonymously, so that Qualfon may conduct an appropriate review and if necessary, begin an investigation. As noted above, if you provide your name, Qualfon will maintain confidentiality as much as possible under the circumstances.

### *What Qualfon Will Do*

Qualfon is committed to reviewing all reported concerns, conducting proper, fair and thorough investigations tailored to the circumstances, and taking appropriate remedial action and concluding steps as warranted. Action taken by Qualfon in response to a concern will depend on the nature and severity of the concern. This may include initial inquiries and fact-gathering to decide whether an investigation is appropriate and, if so, the form and scope of the investigation. Note that an investigation into concerns raised is not an indication that they have either been confirmed or rejected. Qualfon complies with the law in conducting investigations and expects that employees will cooperate with an investigation. Qualfon also expects that employees will provide truthful information when participating in an investigation.

Please note as well that Qualfon does not prohibit anyone from reporting concerns to, making lawful disclosures to, providing documents or other information to, or communicating with the Equal Employment Opportunity Commission (“EEOC”), The National Labor Relations Board (“NLRB”), or any other federal, state or local agency about conduct believed to violate laws or regulations. Qualfon also does not prohibit employees from participating in an investigation or proceeding conducted by one of these agencies.

### *Adherence to This Policy*

Employees who believe that they have been subjected to conduct that violates this policy may register a complaint using the procedures outlined above. Any employee who unlawfully discriminates or retaliates against another employee as a result of his or her protected actions as described in this policy may be subject to disciplinary action, up to and including termination.

Nothing in this policy prevents Qualfon from taking appropriate disciplinary or other legitimate employment action consistent with its usual disciplinary practices and the law. In addition, this policy does not protect employees who knowingly and intentionally raise false concerns or reports.

Remember that taking action may help Qualfon address an issue before it becomes a risk to the safety, security or reputation of our employees or Qualfon.



### *Relationship With Other Policies*

This Code of Conduct does not change or replace the existing policies and procedures contained in the Qualfon Employee Handbook or in any other Operating Procedures. This Code of Conduct is a statement of obligations related to our individual and business conduct. It is not intended to, and does not in any way constitute, an employment contract or an assurance of continued employment. Qualfon does not create any contractual rights by issuing this Code.

### *Acknowledgment*

Directors, officers and employees are accountable for knowing and abiding by Qualfon's Code of Conduct. Qualfon requires that employees, officers, and directors sign an acknowledgment confirming that they have received and read this Code, understand it and are complying with it, annually.





### Signature Page:

This policy will be distributed by the Person Office and reviewed annually by all employees. This Signature Page must be returned to the Person Office and maintained in the Employee Personnel File.

By signing below, I acknowledge that I have reviewed the **Code of Conduct** and agree to conduct myself in accordance with such policy. I understand that failure to comply with the standards set forth in the policy may result in corrective action, up to and including termination.

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Printed Name

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Signature

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Date



## Revision History

REVISION DATE	CHANGE SUMMARY	CHANGED BY/ VERIFIED BY	ANNUAL VERIFICATION COMPLETION DATE
06/16/2014	Policy Established		N/A
04/22/2015	Language Update	Kate Crispignani	N/A
06/24/2015	Inserted Non-Retaliation Clause	Kate Crispignani	N/A
01/29/2016	Annual Update – Document Name Change	Kate Crispignani	N/A
03/08/2016	2016 Update Complete (Honigman Review)	Kate Crispignani	03/08/2016
N/A	Annual Review	Kate Crispignani	09/08/2016
01/09/2017	2017 Update Complete (Honigman Review)	Kate Crispignani	N/A
N/A	Annual Review	Kate Crispignani	07/27/2017
N/A	Annual Review	Kate Crispignani	10/15/2018
06/04/2019	Updated SpeakUp contact information.	Dani Williams	N/A
11/04/2019	Changed LMS to company's electronic learning system. Annual review.	Dani Williams	11/04/2019
07/20/2020	Little Review	Kate Crispignani	07/20/2020
08/24/2020	Update format.	Dani Williams	
4/28/2021	Annual Update	Kate Crispignani	4/28/2021
08/24/2021	Changes Human Resources to the Person Office.	Dani Williams	
05/10/2023	Updated the SpeakUp Internal Hotlines numbers and Rules of Behavior	Dani Williams	
	Annual review.	Dani Williams	06/07/2023
05/30/2024	Added Statement of Core Values, Successful Working Relationships, Protecting Qualfon Confidential Information, Relationship with Other Polices, and Acknowledgement. Updated SpeakUp contact information. Annual review.	Kate Crispignani	05/30/2024