



Reporting Illegal or Unethical Behavior

Reporting Policy

Qnnect and its subsidiaries (the “Company”) proactively promotes an ethical culture by offering employees guidelines for identifying and reporting potential unethical workplace behavior, illegal business activity or Code of Conduct violations. Illegal business activity is defined as “not according to or authorized by law.” Each Qnnect business unit individually defines a Code of Conduct. This policy outlines the procedures for identifying and reporting possible unethical workplace behavior, illegal activity, and/or Code of Conduct violations. The Company offers convenient and anonymous reporting options.

Company personnel are expected to cooperate in internal investigations. The Company will not retaliate against anyone that reports potential breaches made in good faith or that participates in investigations. In addition, it is the policy of the Company to cooperate with all governmental investigative authorities. Each employee, officer and director shall retain any record, document or tangible object of the Company that is subject to an investigation or anticipated litigation.

Compliance Procedures

Employees, officers and directors must work together to ensure prompt and consistent action against violations of Company policies. However, there are situations in which it may be difficult to determine how to act while also complying. Because it is difficult to anticipate every situation that will arise, it is important to have a framework to approach a new question or problem. When considering these situations, Company Personnel should:

- **Consider all relevant information** - To reach the right solutions, try to assemble all relevant information available to you.
- **Focus on the specific question or issue** - If something seems improper, it probably is.
- **Identify who is involved** - In most situations, there is shared responsibility. Are other colleagues informed? It may help to get others involved and discuss the question or problem.
- **Discuss the question or problem with a supervisor** - This is the basic guidance for all situations. In many cases, supervisors will be more knowledgeable about the question, and will appreciate being brought into the decision-making process. Employees should remember that it is the responsibility of supervisors to help solve problems and ensure that the Company complies with this Code.
- **Seek help from Company resources** - In the rare case where it may not be appropriate to discuss an issue with a supervisor, or where a supervisor is not available to answer a question, Company Personnel should discuss it with Corporate Compliance Officers.
- **Always ask first** - When unsure of what to do in any situation, Company Personnel should seek guidance and ask questions before the action in question is taken.

Anonymous Reporting

If all other options have been exhausted and the employee reasonably believes that they need to report behavior anonymously, they may use the Company’s confidential reporting services:

Website: www.lighthouse-services.com/qnnectnow

Toll-Free Telephone:

- **English-speaking USA and Canada: 833-214-2439**
- Spanish-speaking USA and Canada: 800-216-1288
- French-speaking Canada: 855-725-0002
- Spanish-speaking Mexico: 01-800-681-5340

E-mail: reports@lighthouse-services.com (must include company name with report)