



TouchPoint Global Business Code of Conduct

Letter from the CEO



Dear Fellow Colleague,

Since our Company's founding in 1899, our teams around the world have been committed to protecting and enhancing our reputation for quality, integrity and outstanding products and services to our customers. This long standing commitment has helped to build and position TouchPoint as a leader in every market we serve.

At TouchPoint, our core values are the foundation of our culture and business. They are:

- Unquestionable Integrity & Professionalism
- Passion to Create Customer Value
- Strength & Diversity of our Global Community
- Inspired Commitment
- Openness & Candor
- Growth & Results Orientation

Together, these values strengthen the bond of trust we have with one another, our customers, suppliers, shareholders and the communities in which we operate.

The TouchPoint Code of Conduct describes the fundamental behaviors, rules and legal requirements that align with our core values, and ensures we follow them in everything we do.

TouchPoint's Code of Conduct applies to all employees and directors. We want to emphasize that TouchPoint's Code will be enforced fairly and consistently, regardless of your position in the Company. All of us must be familiar with and adhere to our Code of Conduct. You will be asked to formally acknowledge that you have read the Code, understand it and agree to abide by it.

If you ever have a question or concern about an ethics or compliance issue, or any topic covered by our Code, promptly raise it. There are a variety of ways for you to do so; you will not suffer any negative consequences for speaking up in good faith about a concern.

Thank you, in advance, for following the Code and sharing your input. If all of us continue to be guided by the TouchPoint Values and adhere to the Code of Conduct, our reputation for ethical business performance will continue to help drive our success. We are excited about our future and appreciate your renewed commitment to protecting and strengthening these core principles.

Sincerely,

Brian M. McNeill
President & CEO

TOUCHPOINT GLOBAL BUSINESS CODE OF CONDUCT

Code of Conduct Overview – Ethical Foundation for Growth

Welcome to TouchPoint’s Code of Conduct (the “Code”). Our Code defines how we interact with our customers and suppliers, how we treat each other in the workplace, and how our values guide our business decisions.

The essence of our Code of Conduct is simple:

1. We act **ethically** and in accordance with the law.
2. If we are unsure, we **ask**.
3. If something seems wrong, we **speak up**.

This Code applies to every **employee** regardless of role or location. And, while it can’t possibly address every legal or ethical challenge you might encounter, it will certainly point you in the right direction.

It is our responsibility to protect the reputation of the Company, our customers and each other. To do this we reference our Code of Conduct for information; look to our core values to guide our actions; and speak up when we think something is wrong.

In some instances, our Code may establish a higher standard of conduct than what is required by law. However, if you ever believe that following a Code requirement will subject you or the Company to legal liability under local law, please consult with a member of the Legal Department or your business’s leadership team immediately.

We are committed to our vision of being a global leader focused on designing and manufacturing engineered products where the touch point is the differentiating factor, delivering superior value, both to our customers (through engineering and operational excellence) and our stockholders (through attainment of sustained profitable growth and enhanced share value). Achievement of this goal is dependent upon continuous performance of the highest caliber by people who have a passion to excel (which leads to superior financial and operating results) and also upon adherence by all employees, officers and directors (collectively, “Associates”) of TouchPoint, Inc. and its subsidiaries (collectively, “TouchPoint” or the “Company”) to TouchPoint’s standards of ethical business conduct.

Ethical business conduct embraces, at its core, the Company’s commitment to the conduct of the Company’s business in accordance with all applicable law wherever the Company does business, but it does not end there. In many cases, the law sets only a minimal standard of compliance. Our conduct must exemplify a course of the highest integrity at all times. Local customs, laws and conduct are different around the world, and we must recognize and embrace that. Additionally, honesty and integrity are values which are recognized and accepted universally as cornerstones of ethical behavior.

Ethical business conduct is founded upon a common set of priorities and shared values which defines us as a company. Each of us has an individual responsibility and accountability for behaviors in accordance with those priorities and values as we conduct our daily business wherever we are located.

All of us must appreciate that the ways in which the Company and its employees achieve results are just as important to the Company as the results themselves. We all want to be proud

of the work we do and the results we achieve. All of us must deal fairly and in a lawful manner with the Company's customers, suppliers, competitors and with each other. Our reputation for honesty, integrity and fair dealing is at the heart of our brand and who we are as a company, as well as who we are individually. Transactions must be accurately reported, and illegal or questionable practices must not be used to achieve results. Our success as individual Associates and that of the Company depends upon our reputation for honesty, integrity and fair dealing.

Our responsibilities to our stockholders require us to utilize the Company's assets for the business purposes intended and to protect the assets of the Company. Associates must avoid circumstances which place them in a position where they create benefit for themselves at the expense of the Company or where their personal interest is in conflict with that of the Company.

Just as the way we treat each other defines our individual and, in many cases, the corporate value system that we believe in, our brand reputation in the market place helps define who we are to our customers. Our Company, in order to retain its reputation for integrity with respect to our brand, must provide our customers with a quality product that meets not only the minimal requirements, but also meets our requirements. Maintaining the trust of our customers requires the Company and its Associates to stand behind its products at all times. It is the responsibility of each of us to appreciate and support the integrity of our brand in the market place, but also to ensure customers do not take unfair advantage of our willingness to maintain a trusting relationship with our customers.

Summary

Simply put, our affirmation of and commitment to standards of ethical and lawful business conduct unify us as a company, define who we are to ourselves, our customers, stockholders and the communities in which we conduct our daily business.

In order to more fully understand and appreciate the applicability of the Code of Conduct, further discussion of specific standards of conduct follows.

I. Introduction

The Code is applicable to TouchPoint, Inc. and each of its subsidiaries, whether directly or indirectly held and wherever they may be located, and outlines certain procedures for monitoring compliance with the Code.

- All Associates and Directors of the Company have an obligation to observe the Code of Conduct.
- The Code of Conduct is not a comprehensive document intended to address every ethical issue that may be faced by any of us, nor does it provide a summary of all laws, policies or procedures that apply to the conduct of the Company's business.
- We are still expected to rely on our own common sense, good judgment and sense of what is right, guided by the principles and core values contained in the Code, as well as applicable law and the Company's policies and procedures.
- The Code is not intended to supersede or take precedence over other established policies and procedures of the Company, but is supplementary to them.
- Finally, the intention of the Code is to act as a resource and guide describing the ethical and legal responsibilities of all of us at TouchPoint.¹

II. Conflicts of Interest

All of us are expected to conduct our activities in the best interest of TouchPoint. Actions should be based upon sound business judgment, not motivated by personal gain of any kind. A "conflict of interest" may occur when an individual's private interest interferes in any way - or even appears to interfere - with the interests of TouchPoint. Associates are expected to avoid any conflict between their own interests and the interests of TouchPoint.

A conflict of interest can arise under many circumstances, and generally occurs when any interest or activity outside of the Company:

- makes it difficult to perform work for the Company in an objective, efficient or effective manner;
- influences your judgment when acting on behalf of the Company;
- creates competition against the Company;
- diverts business from the Company; or
- misuses Company resources.

A conflict of interest may arise if Associates take opportunities for themselves, personally, that are discovered through the use of Company property, information or position or using corporate property, information or position for personal gain. Such actions violate the duty an Associate owes to the Company to advance the Company's legitimate interests when the opportunities to do so present themselves.

An important question to ask ourselves when attempting to determine if an action is a conflict of interest or may result in ethical misconduct is: Would the action or conduct be an embarrassment to me or the Company when revealed? If you would be embarrassed by revelation of an act or conduct, it is likely to violate the Code standard of behavior. You should seek guidance on these issues.

A. Relationships Which Raise Conflicts of Interest

¹ It should also be noted that the Code is not a commitment, promise or contract (express or implied) that Associates will not be dismissed except for cause.

It is TouchPoint's policy to award business on the basis of merit, without favoritism and, whenever practicable, on a competitive basis. The Code requires that Associates not have personal relationships with vendors, customers or contractors that might influence their responsibility to act in the best interests of TouchPoint. No one may act on behalf of or negotiate with TouchPoint in any transaction involving persons or organizations with whom those persons (or their family: spouse, children, parents, siblings) has any financial interest or significant connection.

Officers of the Company, other members of management and their families and any other Associates who buy or sell goods or services for the Company or influences those decisions, are prohibited from having any economic interest in private or publicly-held business concerns which transact business with the Company or are in competition with it. No Associate or member of an Associate's family shall be financially interested in any business that competes with the Company or shall be in a position to deprive the Company of business opportunities without prior disclosure to the General Counsel of TouchPoint and approval by the functionally appropriate officer. The Code does not apply to ownership of stock in a corporation whose securities are regularly traded on a recognized stock exchange even though that corporation may in some way be competitive with the Company, unless such investments are of such magnitude as to influence the associate's judgment on Company matters or amount to management participation in such other corporation.

The primary principle underlying TouchPoint's policy for avoiding conflicts of interest is that Associates must never permit their personal interests to conflict or appear to conflict with the interests of the Company. Even the appearance of a conflict between personal gain and the interest of the Company erodes the trust and confidence so important to the integrity of our business.

B. Personal Outside Business Activities

Outside business activities could create possible conflicts of interest or could interfere with an Associate's performance on the job. It is expected that each Associate's entire professional energy and ability will be available to the Company.

No Associate may use his/her Company position or title, or any TouchPoint equipment, supplies, personnel or facilities, in connection with outside activities, nor may any Associate do anything that might infer sponsorship or support by the Company of such activity, unless such use or support has been approved in writing by the Associate's immediate supervisor and the next higher supervisory level. Questions concerning the appropriateness of such proposed use shall be referred to the General Counsel.

Prior to seeking any election or appointment to public office that may affect the Company or the Associate's position with the Company in any way, the Associate must notify his/her supervisors in order to clarify the Company's position in the event the Associate's candidacy is successful or the appointment is made. (Service by an Associate with a local, state or federal governmental entity may result in prohibiting or restricting the Company from doing business with that entity. Accordingly, where the Company's interests could be adversely affected, Associates who wish to serve in appointed or elected municipal or other governmental positions must obtain clarification from the municipality or governmental body that there are no statutes, ordinances or bylaws or other

relevant legal authorities prohibiting or restricting the municipality or governmental entity from doing business with the Company by reason of the Associate so serving.)

Subject to the limitations discussed in the Code, each employee is free to engage in outside activities that do not interfere with the performance of his/her job or otherwise conflict with the Company's interests. Where activities may be of a controversial or sensitive nature, employees are expected to seek the guidance of a responsible supervisory authority before engaging in such activities.

III. Confidential Information/Intellectual Property

Associates should maintain the confidentiality of information entrusted to them by the Company or its customers and vendors except when disclosure is mandated by law or authorized by written agreement.

Company confidential information includes all non-public information that might be of use to competitors or harmful to the Company or its customers if disclosed.

The Company respects the intellectual property rights of its competitors, customers and vendors and expects similar treatment with respect to its intellectual property.

This information should be considered a valuable asset of the Company (or such entity) not to be improperly used or repeated to anyone, inside or outside the Company, who has not been authorized to receive it. Confidential information may also include information pertaining to new contracts, research projects, pricing, product inventions, trade secrets and processes or financial information pertaining to TouchPoint or a third party transacting business with TouchPoint.

IV. Communicating with Media and Investors

TouchPoint employees are not authorized to speak with the media or investors on behalf of our Company unless such responsibility is a part of an employee's official job description, or is authorized by a written TouchPoint policy or written authorization from TouchPoint, Inc.'s CEO, CFO or General Counsel. You should not give the impression that you are speaking on behalf of TouchPoint in any communication that may become public unless you have prior authorization to do so. This includes posts to online forums, social media sites, blogs, chat rooms, and bulletin boards. This also applies to comments to journalists about specific matters that relate to our businesses, as well as letters to the editor and endorsements of products or services.

V. Social Media

Social media is of growing importance in the marketplace. It enables us to learn from and share information with our stakeholders, as well as communicate with the public about our Company. If you discuss Company related matters on social media, unless expressly authorized by the Company to make social media posts on the Company's behalf, you must make it clear that you are speaking for yourself and not on behalf of the Company. If you publish content to any website that has anything to do with your work or is in any way associated with the Company, you must make it clear that you are not speaking on behalf of the Company or as an official Company representative. In addition to following all Company policies, a general rule to remember when using social media is to think about the effect of statements that you make. Keep in mind that these

transmissions are permanent and easily transferable and can affect our Company's reputation and relationships with coworkers and customers. You must not disclose confidential and/or proprietary information about our business, our suppliers or our customers, and you must not disclose specific project or initiative details, proprietary applications or software names. The Company must approve in advance all Company branded social media accounts (for example, using the name "TouchPoint" or the name of any TouchPoint business unit, department or product name as part of the account name or URL and/or using the logos of TouchPoint or any of its affiliates in any way). Contact the Legal Department if you have any questions regarding this.

VI. Data Privacy

TouchPoint respects the privacy and personal information of all its Associates, business partners and consumers. This includes Associates' medical and personnel records and information that can directly or indirectly identify an individual, such as name, contact information, and health-related information. Access to personal information is authorized only when there is a legitimate and lawful reason, and access is granted only to appropriate personnel. We will handle personal data responsibly and in compliance with all applicable privacy laws and Company policies (including our records retention requirements). Employees who handle the personal data of others must:

- act in accordance with applicable law;
- act in accordance with any relevant contractual obligations;
- collect, use and process such information only for legitimate business purposes;
- limit access to the information to those who have a legitimate business purpose for seeing the information; and
- take care to prevent unauthorized disclosure.

It is important to remember, however, that Associates should have no expectation of privacy with regard to normal course workplace communication or any personal property brought onto TouchPoint premises or used for TouchPoint business.

VII. Gifts and Entertainment Received by TouchPoint Associates

TouchPoint Associates shall not accept any gift of more than nominal value, or unusual hospitality, lavish entertainment or other favors or advantages which go beyond common courtesies usually associated with accepted business practice or are reasonable compliments to business relationships in one's country or industry. Such gifts, favors, entertainment or advantages have the potential to affect the judgment of persons receiving them who should act in the best interests of TouchPoint and not incur an obligation to a vendor or other person soliciting or doing business with TouchPoint.

A gift may take many forms. Except as permitted below, the term "gift" is intended to include anything of greater than nominal value for which an Associate is not required to pay the retail or usual or customary cost. A gift may be defined to include meals or refreshments, goods, services, tickets to entertainment or sporting events, or the use of a residence, vacation home or other accommodations. It also includes advantages not available to the general public such as discounts, loans of money, concessionary offers and upgrades. Regardless of value, an Associate may never accept a gift of cash or cash equivalents, such as securities, gift certificates or discounts on goods or services not available to the general public.

Customary travel and business entertainment to enable a TouchPoint Associate to develop a business relationship with, and gain information about, a TouchPoint supplier or customer, its personnel and business is permitted. No gift, favor or entertainment should be accepted or provided if it will obligate or appear to obligate the recipient. Normal courtesies need not be rejected, and TouchPoint Associates are expected to follow the standards of ethics and good taste, at all times advising their superiors as to any travel, entertainment or gifts which could possibly raise a question. Outside the United States, it is important to understand the host country's culture and laws in advance and what the limits for accepting or giving gifts are.

VIII. Gifts and Payments Made on TouchPoint's Behalf

Gifts, favors, entertainment and advantages may be given to others at TouchPoint's expense only if they meet all of the following criteria:

- they are consistent with accepted business practice;
- they are sufficiently limited in form and value so as not to be construed as a bribe or payoff;
- they are not in contravention of applicable law and generally-accepted ethical standards; and
- public disclosure of the facts, including the identity of the recipient, will not embarrass yourself or TouchPoint

IX. Bribes and Other Improper Payments/Foreign Corrupt Practices Act ("FCPA")

No bribe, kickback or other improper or unlawful payment shall be made on TouchPoint's behalf. Local practices or customs may be followed with regard to tips or gratuities for services rendered, so long as the amount and timing of the gratuity is such that it could not reasonably be construed as improper or unlawful under U.S. or the host country's law. No agent's fees or commissions shall be paid if the amount or method of payment makes it appear likely that a bribe is included.

Outside the U.S., TouchPoint will honor local laws and applicable U.S. law, including the Foreign Corrupt Practices Act. Generally speaking, the FCPA provides that it is unlawful for any officer, director, associate or agent of TouchPoint, or any stockholder acting on TouchPoint's behalf, to offer, pay, promise to pay or authorize the payment of any money, gift or anything of value to any foreign official, foreign political party or official of such party, or to any candidate for foreign political office, for the purpose of inducing that official, party or candidate to influence a foreign government or governmental agency for the purpose of obtaining or retaining business. However, not all payments to government officials are illegal, but the FCPA rules are complex, and TouchPoint's legal counsel should be consulted before any payment is made to a foreign official.

X. Fraud

It is never acceptable for a TouchPoint Associate to take any part, no matter how small a role, in any activity that involves theft, fraud, embezzlement, extortion or misappropriation of property. Any act of helping to conceal, alter, falsify or omit information is fraudulent, whether that act is for that individual's benefit or at the direction of others. You must refuse to engage in any questionable activities and must report any acts that you suspect are fraudulent to your manager or to the Legal Department.

XI. International Business Conduct

TouchPoint will obey the laws of the countries in which TouchPoint does business, as well as U.S. laws that are applicable to transactions or activities of TouchPoint outside the U.S. Any case of noncompliance with applicable law may subject the Associate involved to disciplinary action. A pattern of enforcement of legally prohibited conduct by a foreign government will not necessarily excuse illegal action on the part of a TouchPoint Associate.

Many laws govern the conduct of trade across borders. These laws regulate activities pertaining to import/export, anti-boycotts, trade sanctions and money laundering. TouchPoint's legal counsel should be consulted before initiating TouchPoint business in any new country or existing host country where issues arise.

XII. Company Assets/Accuracy of Business Records

Accurate and honest reporting of information pertaining to the Company's activities is critical to the Company's ability to communicate its performance to its stockholders. Equally important is the essential need of the Company's management to have accurate and reliable information upon which to make responsible business decisions. All financial books, records and accounts must accurately reflect transactions and events and conform to generally-accepted accounting principles and to the Company's policies and principles with regard to financial reporting and operational performance metrics. Correct information must not be concealed from management or independent auditors.

No undisclosed or unrecorded fund or asset shall be established for any purpose. No withdrawal shall be made from any disbursement account except by check or other acceptable means of transfer customarily used by major banks, and then only by authorized personnel. No check shall be made payable to "cash" or other unidentifiable payee.

No false or artificial entries shall be made in the Company's books or records, and no Associate shall engage in any arrangement that results in such entry.

No payment shall be approved or made with the intention or understanding that the payment, or any part of it, will be used for any purpose other than that disclosed by supporting documents.

TouchPoint's policy regarding books and records applies not only to accounting books and records, but also to any other records, reports or documents of the Company, including, but not limited to, time cards, payroll and service records, travel, entertainment and other expense reports, and measurement and performance records, all of which must be prepared with complete honesty.

Documents should only be destroyed in accordance with the applicable document retention policy and never in response to or in anticipation of an investigation or audit. TouchPoint's Legal Department should be consulted with respect to any questions or issues pertaining to records retention or destruction.

All Associates are entrusted with safeguarding assets belonging to the Company and to use them solely in the conduct of the Company's business. Assets include not only cash, but property, equipment, inventory, computers and software, as examples.

XIII. Political Contributions and Activities

In the U.S., federal and many state laws prohibit corporations from making political contributions. No Associate is authorized to make any direct or indirect political

contribution (including the use of TouchPoint property, equipment, funds or other assets) of any kind, on the federal level, in the name of TouchPoint, or to utilize TouchPoint funds for this purpose.

On the state, county and local level and in countries other than the U.S., where allowed by law, political contributions may be authorized on behalf of TouchPoint only after the General Counsel of TouchPoint, or his designee, has certified in writing that they comply with applicable law. When such permission is given, such contributions shall be by check to the order of the political candidate or party involved or by such other means as will readily enable TouchPoint to verify, at any given time, the amount and origin of the contribution.

The above prohibitions relate only to the use of corporate funds, property and assets and are not intended to discourage Associates from making personal political contributions (including those to a Political Action Committee) or engaging in personal political activities on their own time, as may be permitted under applicable law.

XIV. Charitable Contributions

Our Company is a vital part of each of the communities that host our facilities throughout the world, and we participate in many humanitarian and charitable endeavors. Our participation ranges from cash contributions to donations of TouchPoint manpower or resources. When we elect to participate in a community project, the local site management communicates to Associates in advance that the effort is a Company-sponsored project. TouchPoint Associates must pursue personal community activities on their own time, with their own resources and as individual private citizens and not as representatives of TouchPoint. TouchPoint Associates must not claim to represent, or imply representation of, TouchPoint to the public or in any public process or forum unless specifically requested to do so by management. You should consult the Legal Department if you have questions about permissible use of Company resources.

XV. Antitrust Laws/Competition Laws

The objectives of the antitrust laws are to protect and foster competition. Certain specific activities have been clearly identified as violations of these laws, such as:

- agreements with competitors to fix prices, or other terms or conditions of sale;
- to allocate customers, markets or territories;
- to fix production levels or quotas; or
- to boycott third parties

In addition, other activities such as price discrimination, tie-in sales, exclusive dealings or reciprocity arrangements may contravene these laws if they are deemed to have substantially reduced competition. The courts have found antitrust violations to exist without any formal agreement where conduct (e.g., the exchange of information among competitors) suggested concerted action to achieve a prohibited purpose.

Particular attention should be paid to trade associations which, by definition, are groups consisting of competitors. Associates must be extremely careful not to discuss any prohibited subject at any meeting of such associations. No Associate shall attend any trade association or similar meeting unless it has been called for a valid business purpose. Should any improper discussion ensue at any such meeting, the Associate shall leave immediately and report the incident as soon as possible to the General Counsel. Violation can result in heavy civil fines and criminal penalties at both the

corporate and individual levels, including treble damage actions by any injured private party.

Not only may the antitrust laws of the U.S. apply to TouchPoint's global operations, but the similar laws of a number of other nations, and the European Union, apply. It is, therefore, essential that all Associates worldwide adhere to these principles and immediately bring to the attention of the General Counsel for review any proposed action or activity with possible anti-competitive effect.

XVI. TouchPoint Manager Responsibilities

All TouchPoint Associates must show a commitment to our values through their actions. They also must promote an environment where compliance is expected and ethical behavior is the norm. All TouchPoint Associates must comply with the Company's values and principles. No TouchPoint Associate should ever ask another Associate to break the law or go against the Company's values, policies and procedures.

Leaders, by virtue of their positions of authority, must be ethical role models for all Associates. An important part of a leader's responsibility is to exemplify our corporate values and exhibit the highest standards of integrity. Leaders must communicate the seriousness of our Company's expectations for ethical conduct and their own personal support of these expectations by holding everyone accountable for making sound ethical judgments. Leaders must be alert to any situations or actions that may be unethical or potentially damaging to our reputation. They must take prompt action to address such situations and be careful to avoid even the appearance of implicit approval.

XVII. Associate Relations

TouchPoint will comply with the employment laws of all countries in which it does business. Discrimination on the basis of a person's race, color, gender, national origin, age, religion, disability, veteran/military status or other protected persons, is prohibited. TouchPoint values the differences and diversity of all employees and views this as strength for our business.

All employees deserve to work in an environment that is free from unlawful discrimination, harassment, coercion or abuse, whether verbal or physical. Actions on the part of any employee that harass another employee or create an intimidating, offensive, abusive or hostile work environment will not be tolerated.

Unwelcome sexual advances, requests for sexual favors and other unwelcome verbal or physical conduct of a sexual nature are specifically prohibited. Associates should speak out and report such conduct to their supervisor or next senior level supervisory management, as well as their Human Resources Manager.

XVIII. No Retaliation

It is the policy of the Company that no retaliation shall occur as a result of an Associate raising or reporting, in good faith, a business conduct issue or perceived violation of law.

XIX. Drug and Alcohol Free Workplace

TouchPoint strives to maintain a workplace that is free from the use, possession, sale, or distribution of alcohol or controlled substances. Alcohol and drug abuse can endanger the health, safety and security of our Associates and our customers, adversely affect the

quality and effectiveness of our Company operations and potentially harm fellow Associates, the communities we live in and our Company reputation. The use, possession, sale, purchase, distribution, manufacture or transfer of alcohol, illegal drugs, or unauthorized drugs is prohibited on TouchPoint premises or work sites. No TouchPoint Associate or any employee of a contractor may report to work or perform any job duties for TouchPoint while under the influence of or impaired by alcohol or drugs.

XX. Human Rights

We are committed to upholding fundamental human rights and believe that all human beings around the world should be treated with dignity, fairness, and respect. We want our suppliers and direct contractors to demonstrate a serious commitment to the health and safety of their workers and to comply with human rights laws. TouchPoint does not use or condone the use of slave labor or human trafficking, and we denounce any degrading treatment of individuals or unsafe working condition.

We are committed to following all applicable wage and hour laws and regulations. Anyone paid based on hours worked must report and record all time worked accurately in accordance with established local procedure.

XXI. Environmental/Safety and Health

TouchPoint is committed to compliance with environmental laws and regulations applicable to its business. We will act responsibly, encouraging respect for the environment and instituting appropriate operating practices to improve environmental compliance and protection of the environment inside our facilities, as well as the surrounding communities.

The safety and health of all TouchPoint Associates is a core value of our Company, and we will conduct our business in a manner intended to protect the safety and health of all Associates. We will comply with applicable law and regulation and apply reasonable standards where laws or regulations do not exist. We will hold all employees accountable for safe performance of their jobs through observance of appropriate safety practices and procedures.

XXII. Social Responsibility

We pride ourselves on being a company that operates with integrity, makes good choices, and does the right thing in every aspect of our business. We will continually challenge ourselves to define what being a responsible company means to us, and work to translate our definition into behavior and improvements at TouchPoint. We seek to align our social and environmental efforts with our business goals and continue to develop both qualitative and quantitative metrics to assess our progress.

Our Responsibilities and Expectations

All Associates are expected to read and understand the Code and the guidelines and policies contained in it. We are all expected to follow the ethical behaviors as they relate to our job responsibilities at the Company.

All Associates are encouraged to seek guidance in resolving business ethics and conduct issues by speaking with supervisors, managers, their Human Resources Manager,

officers of the Company and the Legal Department. Officers, directors, managers and supervisors are expected to:

- Monitor and use their best efforts to ensure compliance with this core policy by Associates and others conducting business on behalf of the Company. This includes being open and available to discuss concerns.
- Setting an example of exemplary ethical conduct.
- Dealing effectively with business ethics concerns that arise in their area of responsibility.
- Assisting the Company in prohibiting retribution against any employee who reports or supplies information about, or assists an investigation into, a business ethics concern.

Any Associate who has knowledge of possible violations of law or the Code has a duty to report this. This report may be directed to the General Counsel at 610-361-6773 or to their immediate supervisor, manager, business unit attorney, director or officer of the Company who, in turn, must advise the General Counsel of the report. In addition, all Associates other than our European Associates² may make a report to the TouchPoint Compliance Hotline by leaving a voice mail message at 610-361-6500. Reports to the Compliance Hotline may be made anonymously.

No Associate who in good faith reports an actual or suspected violation of the Code or law will be subject to retaliation or discipline for having done so. Failure to report a violation of the Code or applicable law may result in disciplinary action, which could include separation from employment in appropriate circumstances as determined by the Company, in its discretion. Associates who have participated in wrongdoing or violations of the Code or law will be subject to disciplinary action, including dismissal.

To encourage Associates both to seek guidance before engaging in behavior that is inconsistent with the Code and to report violations, the following principles shall apply:

- Anonymity: Associates based outside of Europe reporting violations have the option of remaining anonymous. If an Associate requests anonymity, that request shall be respected, and no steps shall be taken to identify him or her. However, Associates should be aware that in instances where they insist upon anonymity, it may be more difficult (if not impossible) for the Company to follow up, investigate and remedy the alleged wrongdoing as thoroughly as it would otherwise like to.
- Confidentiality: all practical steps must be taken to safeguard confidentiality. Confidentiality may not be possible, for example, in reporting harassment or certain violations of the law.
- Thorough and Fair: reports of wrongdoing must be followed up thoroughly, appropriately and fairly. Even when the General Counsel does not conduct an investigation personally, he is responsible for monitoring the process and reviewing outcomes for consistency. The General Counsel shall approve the disposition of each inquiry and communicate that resolution back to the reporting Associate.

All files of inquiries generated by the Legal Department shall be marked "Confidential" and maintained by the Legal Department on a confidential basis. They shall not be disclosed outside the Legal Department except to:

² Because various European jurisdictions have regulations discouraging or prohibiting anonymous hotline reporting or limiting the types of complaints which can be made to hotlines, the TouchPoint Compliance Hotline is not available to our Associates based in Europe. They should instead utilize one of the other reporting options in the Code.

1. Officers or Company representatives (such as outside counsel or auditors) having a need to know;
2. Members of the Board of Directors;
3. As may be required by law or upon an order from a court of competent jurisdiction.

Implementation of the Code

The Code, or, in management's discretion, a summary format of the Code, shall be distributed to all Associates worldwide and to all new hires at the time of their employment. All Associates at the level of supervisor or above (or equivalent at international locations) shall sign an acknowledgment that they have read, understood and agree to comply with the Code. Such Associates shall sign the acknowledgment at the time of employment and whenever the Code is revised. An acknowledgment shall also be signed by such other Associates of TouchPoint, and at such other times as the President may direct from time to time. The Human Resources Department of each business unit is responsible for:

- maintaining a record that all new hires have received a copy of the Code as part of their orientation; and
- obtaining all required acknowledgments from Associates in the unit.

The Vice President-Human Resources Development of TouchPoint, Inc. shall confirm annually to the General Counsel that this section has been complied with.

Questions involving compliance with any laws and regulations coming within the scope of the Code shall be immediately referred to the General Counsel of TouchPoint or to the responsible in-house attorney for your business unit.

11/16/2018