



THE TOUCHPOINT
**CODE OF
CONDUCT**

Effective April 1, 2026

LETTER FROM CEO3-4

INTRODUCTION5-6

- Code of Conduct Overview— Building an Ethical Foundation for Growth5
- Our Responsibilities and Expectations6
- Understanding the Code6

HOW THE CODE IS IMPLEMENTED7

OUR VALUES AT WORK8

- Creating a Community of Care through Collective Strength
- Speaking Up Without Fear of Retaliation
- Treating Each Other With Unquestionable Integrity
- Your Responsibilities

ACTING WITH INTEGRITY ..9-11

- Avoiding Conflicts of Interest9
- Handling Confidential Information and Intellectual Property10
- Managing Company Assets and Keeping Accurate Records10
- Dealing with Gifts and Entertainment11
 - i. Gifts and Entertainment Received
 - ii. Giving Gifts on TouchPoint’s Behalf

ETHICAL BUSINESS PRACTICES12-13

- Preventing Bribes and Improper Payments12
- Avoiding Fraud12
- Avoiding Money Laundering12
- Following International Business Standards13
- Complying with Antitrust and Competition Laws13

COMMUNICATING RESPONSIBLY14-16

- Talking to Media and Investors14
- Using Social Media14
- Data Privacy: Protecting Personal Information15
- Cybersecurity16

CONTRIBUTING TO SOCIETY17-19

- Our Social Responsibility17
- Upholding Human Rights17
- Environmental, Safety and Health Commitments18
- Charitable Contributions19
- Political Contributions and Activities19

WORKPLACE STANDARDS ...20

- Maintaining a Drug and Alcohol-Free Workplace

OUR RESPONSIBILITIES AND EXPECTATIONS21

REPORTING CONCERNS22

CONCLUSION23

Dear Team,

Since our Company's founding back in 1899, our employees across the globe have always been dedicated to upholding our reputation for quality, integrity, and providing top-notch products and services to our customers. This ongoing commitment has helped us become a leader in every market we serve.



At TouchPoint, our core values are the heart of our culture and business. These values are:

- **Integrity:** We hold ourselves to the highest standards, knowing that how we behave is as important as what we achieve. Even when the right path is harder, we choose it to uphold the strongest legal and ethical considerations.
- **Stewardship:** We honor the legacies entrusted to us by making disciplined choices that protect the entrepreneurial vision of the founders who came before while creating enduring value for the future. We lead with an ownership mindset at every level, taking initiative, acting with accountability, and owning the outcomes we create.
- **Customer-Driven Ingenuity:** We connect deeply to customer needs, creating solutions and shaping our processes to accelerate innovations that keep the world running. Our products and solutions matter because they create meaningful value for those we serve.
- **Community of Care:** We act with care and generosity, taking time to know one another, openly exchanging ideas and insights, and building trust that endures beyond the workday. Together, we create a workplace where people feel supported, valued, and proud of what we achieve.
- **Collective Strength:** We build together by partnering across platforms and geographies to solve customers' problems, learning from one another and sharing best practices. We draw strength from the diversity of our industries, cultures, and generations that make the whole greater than the sum of its parts.

These values strengthen the trust we share with each other, our customers, suppliers, shareholders, and with the communities where we operate.

The TouchPoint Code of Conduct (the "Code") outlines the key behaviors, rules, and legal requirements that align with our core values, making sure we follow them in everything we do. The Code applies to all employees and directors, and we want to emphasize that it will be enforced fairly and consistently, no matter your position within the Company. We all need to be familiar with and adhere to our Code, so from time-to-time you will be asked to formally acknowledge that you've read the Code, understand it, and agree to follow it.

If you ever have a question or concern about ethics, compliance, or anything else covered by our Code, please speak up. There are many ways to do so, and rest assured, you won't face any negative consequences for raising a concern in good faith.

Thank you in advance for following the Code and our core principles. By continuing to be guided by TouchPoint's values and sticking to our Code, we act as strong stewards of the legacy entrusted to us and create enduring value for our future. Together, we carry forward a legacy of reinvention that keeps the world running.

Best regards,

A handwritten signature in black ink that reads "Staci Kroon". The signature is written in a cursive, flowing style.




Staci Kroon

President & CEO, TouchPoint

CODE OF CONDUCT OVERVIEW – BUILDING AN ETHICAL FOUNDATION FOR GROWTH

Welcome to TouchPoint's Code of Conduct (the "Code"). This Code is our guide for how we interact with our customers and suppliers, how we treat each other at work, and how our values influence our business decisions.

The core of our Code is straight forward:

-  **We act honestly and ethically, and we follow the law.**
-  **If we're unsure about something, we ask for guidance.**
-  **If something doesn't seem right, we speak up.**

This Code applies to the entire TouchPoint group, which includes all of TouchPoint's affiliated entities around the world (together, the "Company"), and it applies equally to everyone at TouchPoint, no matter your role or location. While it can't cover every situation you might face, it will definitely point you in the right direction. We also require our suppliers and vendors to meet our high standards, and we require each of them to acknowledge our Supplier Code of Conduct.

As we celebrate more than 125 years of being in business, the secret to our success has always been our people and our culture of integrity, resilience and spirit of ownership. In order to create exceptional value for generations, we must always act to protect the reputation of the Company, our customers, and each other. We do this by using our Code as a reference, letting our core values guide our actions, asking questions, and speaking up when something feels off.

"Ethical business conduct means more than just following the law. While laws set the minimum standard, we strive for the highest level of integrity in everything we do. We recognize that local customs and laws vary around the world, but honesty and integrity are universal values that we uphold everywhere."

It's important to remember that how we achieve results is just as important as the results themselves. We should all be proud of the work we do and the way we do it. Fairness, following the law, and honesty are at the heart of our Company's reputation. Our firm dedication to these principles provides the stable foundation from which we achieve long-term success.

Our responsibilities to our shareholders mean that we should use the Company's assets for their intended business purposes and protect those assets. We must avoid situations where our personal interests conflict with those of the Company.

How we treat each other reflects our values as individuals, and our brand reputation reflects who we are to our customers as a company. To maintain our reputation for integrity, we must always provide quality products that meet not only our customers' expectations but also our own high standards. Keeping our customers' trust is crucial, and it's up to all of us to ensure that we stand behind our products and maintain a fair and trusting relationship with our customers.

OUR RESPONSIBILITIES AND EXPECTATIONS

We all have a shared responsibility to uphold the highest standards of ethical and lawful business conduct. This commitment brings us together as a company and shapes how we are perceived by ourselves, our customers, our shareholders, and the communities where we operate.

UNDERSTANDING THE CODE

To help everyone better understand how the Code applies to their role, we've outlined some key guidelines below.

WHO IT APPLIES TO

The Code applies to everyone at TouchPoint, Inc. and all of its companies, no matter where they are located. All board members, officers, directors and all other employees must follow the Code.

WHAT IT COVERS

The Code provides guidelines for ethical behavior and legal compliance. It isn't meant to cover every possible ethical situation or legal detail. It's here to guide us, but we should also use our common sense, good judgment, and understanding of what's right.

SUPPLEMENTARY GUIDANCE

The Code doesn't override other Company policies, but it's an important resource that complements them.

NOT A CONTRACT

Remember, the Code isn't a contract or promise that you can only be dismissed for specific reasons.

HOW THE CODE IS IMPLEMENTED

We want to make sure everyone is familiar with our Code, so it is shared with all employees worldwide, including new hires when they join the Company. All new employees must sign an acknowledgment starting with the Company and all employees must sign an acknowledgment whenever the Code is updated.

To ensure that we accomplish this, the Human Resources Department in each region will keep a record that all new hires have received a copy of the Code during their orientation and collect the necessary acknowledgments from employees in each region. And to make sure that all of us are fully aware of the Code and follow it, from time-to-time you will need to complete training sessions related to the Code.

If you have any questions about how the Code applies to specific laws or regulations, please reach out to the General Counsel of TouchPoint or your regional Company attorney. For a copy of any policies referenced in the Code, please see your Company's intranet.

CREATING A COMMUNITY OF CARE THROUGH COLLECTIVE STRENGTH

We draw strength from the diversity of our cultures, industries, and generations that make the whole greater than the sum of its parts. Together, we create a workplace where people feel supported, valued, and proud of what we achieve.

We value the input of others, from all backgrounds and perspectives. This helps us create a work environment where fresh ideas can drive innovative technologies and new products. And we are committed to the ideals of mutual respect and inclusion, to learning, and to improving and striving for better.

SPEAKING UP WITHOUT FEAR OF RETALIATION

We are committed to ensuring that no one faces retaliation for reporting a business conduct issue or potential legal violation in good faith. To ensure this, TouchPoint has implemented a global Whistleblowing Policy. Please contact Legal Department for this policy if needed.

TREATING EACH OTHER WITH UNQUESTIONABLE INTEGRITY

We value diversity and see it as a strength. We will ensure that all of us are treated in a professional manner, with courtesy and respect, in a workplace that is free of any type of intimidation.

TouchPoint is committed to following employment laws everywhere we operate. Discrimination based on race, color, gender, national origin, age, religion, disability, veteran status, or other protected categories is not tolerated.

Everyone deserves to work in a place free from discrimination, harassment, intimidation or abuse. This includes unwelcome sexual advances or other inappropriate behavior. If you experience or witness such conduct, report it to your supervisor, senior management, or Human Resources.

YOUR RESPONSIBILITIES

As a TouchPoint director or employee, your actions should reflect our values, which call for all of us to act with integrity holding ourselves to the highest standards. Everyone should strive to create a culture where ethical behavior is expected. No one should ask others to break laws or violate Company policies. All of us must follow TouchPoint's Anti-Discrimination and Harassment Policy.

Managers have an extra responsibility to lead by example and model the way. They should show the highest standards of integrity and make it clear that ethical behavior is essential. They must be vigilant for any unethical behavior and address it quickly, ensuring that even the appearance of approval is avoided.

AVOIDING CONFLICTS OF INTEREST

We're all expected to act in TouchPoint's best interests. Our decisions should be based on what's best for the Company, not on personal gain.

A conflict of interest happens when personal interests interfere, or appear to interfere, with TouchPoint's interests. This could include:

- Making decisions that aren't in the Company's best interest.
- Letting personal relationships affect your judgment or work.
- Competing with or diverting business away from the Company.
- Misusing Company resources for personal benefit.

It's important to ask yourself: "Would I be embarrassed if this action were made public?"

If the answer is yes, it's probably a conflict of interest. In such cases, it's best to seek advice.

RELATIONSHIPS THAT COULD CAUSE CONFLICTS

We base our business decisions on merit, without favoritism. It's important that personal relationships with vendors, customers, or contractors don't influence your decisions. No one may act on behalf of or negotiate with TouchPoint in any transaction involving persons or organizations with whom such person (or their family: spouse, children parents, siblings) has any financial interest or significant connection. In addition, no employee or director or their family member shall be financially interested in a company which competes with TouchPoint without prior disclosure to the TouchPoint General Counsel and approval by the functionally appropriate officer.

This Code does not apply to owning stock in a publicly-traded company that competes with TouchPoint unless it could reasonably influence your judgment or involves management participation.

The main takeaway is that personal interests should never conflict with the Company's interests.

Even the appearance of a conflict can damage the trust and confidence we've built.

OUTSIDE BUSINESS ACTIVITIES

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

■ USING COMPANY RESOURCES:

Don't use your position, Company equipment, or any other resources for outside activities, and don't do anything that might infer sponsorship or support by the Company of such activity, unless you have written approval from your supervisor and the next higher supervisory level.

■ PUBLIC OFFICE:

If you're considering running for or accepting a public office, let your supervisor know so the Company can ensure there are no conflicts.

Subject to the limitations discussed in this Code, you are free to engage in outside activities as long as they don't conflict with your job or the Company's interests. If you're unsure, it's always a good idea to ask for guidance.

HANDLING CONFIDENTIAL INFORMATION AND INTELLECTUAL PROPERTY

It's important to keep the information given to you by the Company, our customers, and our vendors confidential unless the law requires you to share it or you have written permission to do so. Confidential information includes any non-public details that could be useful to our competitors or damaging to our Company or customers if it gets out.

We also respect the intellectual property rights of others, including our competitors, customers, and vendors, and we expect the same respect for our own intellectual property. Treat this information as a valuable asset—don't share it with anyone inside or outside the Company unless they are authorized to receive it. This includes information about new contracts, research projects, pricing, product inventions, trade secrets, and financial details related to TouchPoint or any third-party doing business with us.

We enter into many nondisclosure agreements and trademark and licensing agreements to help protect our information and the information of our business partners. Please contact the Legal Department if you have any questions about these or if you need assistance in negotiating any of these agreements.

MANAGING COMPANY ASSETS AND KEEPING ACCURATE RECORDS

It's important for us to report information about our Company's activities accurately and honestly. This helps us communicate our performance to our shareholders and ensures that management has the reliable information needed to make good decisions. With our focus on growth and results, it is vitally important that all our financial books, records, and accounts should reflect what actually happens, following generally accepted accounting principles and the Company's policies.

We should never hide correct information from management or our auditors, and there should be no undisclosed or unrecorded funds or assets. Payments should only be made by authorized personnel using proper channels, like checks or bank transfers, and there should be no false or misleading entries in our records. Every payment should be fully supported by documents that explain its purpose. No check shall be made to "cash" or other unidentifiable payee. 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.

Our policy applies to all records, not just financial ones. This includes timecards, payroll records, expense reports, and performance records. All documents should be prepared with complete honesty. Documents should only be destroyed according to the Company's document retention policy and never in response to or in anticipation of an investigation or audit. If you have any questions about records retention or destruction, consult our Legal Department.

We're all responsible for acting as wise stewards of the Company's assets and using them only for Company business. This includes not just cash, but also property, equipment, inventory, and even computers and software.

We are all responsible for following the Company's document retention policy, which details how long we must keep each type of business record and when documents should be destroyed.

DEALING WITH GIFTS AND ENTERTAINMENT

GIFTS AND ENTERTAINMENT RECEIVED

As a TouchPoint employee or director, it's important to avoid accepting any gifts, hospitality, or entertainment that goes beyond common business courtesies.

Accepting anything more than what is customary in your industry or region could influence your judgment and create a conflict of interest.

A "gift" can be many things, such as meals, services, tickets to events, or discounts. However, it's crucial never to accept cash or cash equivalents like gift cards, such as laisee/red envelope or similar gifts.

While it's okay to participate in business entertainment or receive small tokens of appreciation that help build relationships with customers or suppliers, anything that could be seen as creating an obligation should be politely declined. Keep your superiors informed about gifts or entertainment you receive, especially if there's any potential for it to be seen as inappropriate. Make sure you understand the local customs and laws about gift giving in your region and in the region where you are given a gift and please also ask the Legal Department if you are uncertain about the amount of gift or entertainment that you may receive.

GIVING GIFTS ON TOUCHPOINT'S BEHALF

When giving gifts, entertainment, or other benefits on behalf of TouchPoint, it's important to follow these guidelines:

- **Ensure the gesture aligns with common business practices.**
- **Keep the value of the gift modest, so it doesn't come across as a bribe.**
- **Make sure it complies with the law and ethical standards.**
- **Be comfortable with the idea that the details could be made public without causing embarrassment to you or TouchPoint.**

By keeping these principles in mind, we maintain the integrity of our business and relationships, and please also ask the Legal Department if you have any questions or are unsure about any gift, entertainment or other benefit you may give on behalf of TouchPoint.



PREVENTING BRIBES AND IMPROPER PAYMENTS

TouchPoint has a zero-tolerance policy for bribes, kickbacks, or any other improper payments made on our behalf. While local customs might include tips or gratuities for services, these must always be within legal and ethical limits. 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. Any payment should be clearly above board and must not even remotely appear to be a bribe.

TouchPoint follows all laws and regulations, such as the U.S. Foreign Corrupt Practices Act ("FCPA") and the U.K. Anti-Bribery and Corruption Act ("ABC") wherever they apply. All TouchPoint board members, officers, directors, employees, agents, and shareholders are prohibited from offering, paying, or authorizing payment to foreign officials, political parties, or candidates in exchange for business advantages. Always consult TouchPoint's Legal Department before making any payment to a foreign official to ensure compliance with applicable laws and our Code.

All of us must follow TouchPoint's Anti-Bribery and Corruption Policy.



AVOIDING FRAUD

At TouchPoint, there is no room for any involvement in theft, fraud, embezzlement, extortion, or misappropriation of property—no matter how small. Fraud also includes any act of concealing, altering, falsifying, or omitting information, whether for personal gain or under someone else's direction. If you're ever asked to engage in or suspect any fraudulent activities, it's your responsibility to refuse and report them to your manager or the Legal Department.



AVOIDING MONEY LAUNDERING

Money laundering is when people try to hide illegally obtained money or make it seem legitimate. It's against the law and strictly prohibited by TouchPoint. In some cases, we may even need to report suspicious activities. Be on the lookout for things like someone trying to make large cash payments; payments from third parties not directly involved in a business transaction with TouchPoint; requests to overpay; payments in a different currency than agreed; payments from unusual accounts; or any odd patterns like repeated cash payments. If anything seems off or if you have any questions, reach out to the Legal Department for guidance.



FOLLOWING INTERNATIONAL BUSINESS STANDARDS

TouchPoint is committed to obeying the laws of every country where we operate, as well as applicable U.S. laws for international transactions. Noncompliance with these laws can lead to serious disciplinary actions. Even if certain actions are tolerated locally, they don't justify illegal conduct by a TouchPoint employee or director.

Many laws regulate international trade, including those governing imports, exports, antiboycotts, trade sanctions, and money laundering. Before starting business in a new country or when facing legal issues in an existing one, consult TouchPoint's Legal Department.



COMPLYING WITH ANTITRUST AND COMPETITION LAWS

Antitrust laws and competition laws are here to keep competition fair and protect the marketplace. They make certain practices illegal, like:

- Discussing with competitors pricing or other sale terms or business strategies.
- Dividing up customers, markets, or territories.
- Fixing production levels or quotas.
- Boycotting third parties.

Other actions, such as unfair pricing, tying sales, or exclusive deals, can also be problematic if they harm competition. Even if there's no formal agreement, just acting in a way that suggests collusion can be a violation.

Be extra cautious with trade associations, which are groups of competitors. Avoid discussing any sensitive topics at these meetings. If anything inappropriate comes up, leave right away and report it to the General Counsel. Violations can lead to serious fines and legal trouble, both for the Company and individuals.

Antitrust laws and competition laws not only apply in the U.S. but also in many other countries and the European Union, so it's crucial for everyone worldwide to follow these rules and check with the Legal Department if you're unsure about any actions that might impact competition.

TALKING TO MEDIA AND INVESTORS

We aim to keep our communication with the media and the public clear and accurate to uphold the trust people have in us as a company. That's why only specific employees are authorized to speak to the media or investors on behalf of the Company. Unless your job specifically includes this responsibility, or you have written authorization from our CEO, CFO, or General Counsel, you shouldn't give the impression that you're speaking on behalf of TouchPoint in any public communication. This includes anything you might post online, like on social media, blogs, or forums, as well as comments to journalists, letters to the editor, or product endorsements.

USING SOCIAL MEDIA

Social media is a powerful tool, and while it's great for connecting with others, it's important to be careful when talking about our Company online. When using social media, always use good judgment and be respectful when sharing ideas and opinions; make it clear that your opinions are your own and don't represent the Company; and avoid spreading rumors or speculating about any Company matters you're involved in or have knowledge of. If you're posting anything related to your work or our Company, be sure to say that you're speaking for yourself, not as an official representative.

Remember, what you post online can be permanent and easily shared, so always think about how your words might impact our Company's reputation and relationships. Never share confidential or proprietary information about our business, suppliers, or customers. Don't post specific details about projects, proprietary software, or applications. Also, any social media accounts that use the Company name, logos, or any related branding need prior approval from the Company. If you're unsure, always check with the Legal Department first.



DATA PRIVACY: PROTECTING PERSONAL INFORMATION

At TouchPoint, we take the privacy of our employees, business partners, and customers very seriously. This includes handling personal information, such as names, contact details, and health information, with the utmost care. Access to this data is strictly controlled and only granted when there's a valid, lawful reason. We ensure that any personal information is handled in line with privacy laws and Company policies, including our data retention rules.

If you're someone who works with personal data, here are a few things to keep in mind:



ALWAYS FOLLOW

the law and any relevant contracts.



COLLECT & USE

information for legitimate business reasons only.



SHARE

information only with those who truly need it for business purposes.



TAKE STEPS

to protect against unauthorized access or sharing of this information.

Remember, while we respect privacy, there should be no expectation of privacy when it comes to workplace communications or personal belongings brought onto TouchPoint property or used for business purposes.



CYBERSECURITY

We all rely more and more on connected devices like laptops, tablets, and phones to get work done and stay in touch. That's why it's important for each of us to help protect our data and systems from being misused, tampered with, or accessed by unauthorized people. Here are some key things to keep in mind:



ALWAYS FOLLOW

our policies and procedures to safeguard our systems, apps, networks, and assets from attacks or unauthorized access.



BE CAUTIOUS

Don't click on suspicious links in emails, even if they look familiar. Only open links from sources you trust.



NEVER SHARE

your usernames and passwords with anyone other than an authorized IT representative with a specific need for the information.



STAY ALERT

to phishing scams or any attempts to get sensitive personal or Company information.

By following these simple steps, we can keep our information and systems safe!



OUR SOCIAL RESPONSIBILITY

We take pride in running our business with unquestionable integrity and making responsible choices. We're always looking to improve and be a more responsible company, aligning our social and environmental efforts with our business goals. We'll keep tracking our progress with clear goals and metrics to ensure we're making a positive impact.



UPHOLDING HUMAN RIGHTS



At TouchPoint, we're all about treating everyone with respect and fairness. We believe everyone deserves dignity and equal treatment and we expect our suppliers and contractors to take workers' health and safety seriously and to follow human rights laws. Remember, respect for human dignity starts with how we treat each other, our customers, and our business partners every day. This means embracing the strength and diversity of our global community, accommodating disabilities, and ensuring we protect the rights and dignity of everyone we work with. We don't support or use slave labor, human trafficking, or any form of mistreatment. We also ensure that all wage and workhour laws are followed and that everyone accurately reports their hours worked.

We strictly follow all laws related to the prohibition of forced labor and child labor. We grant all employees the freedom of association and the right to collective bargaining. TouchPoint has implemented the following global policies related to this, and all of us must strictly follow each of these policies:

Child Labor Policy

Employee Grievances Policy

Freedom Of Association And Collective Bargaining Policy

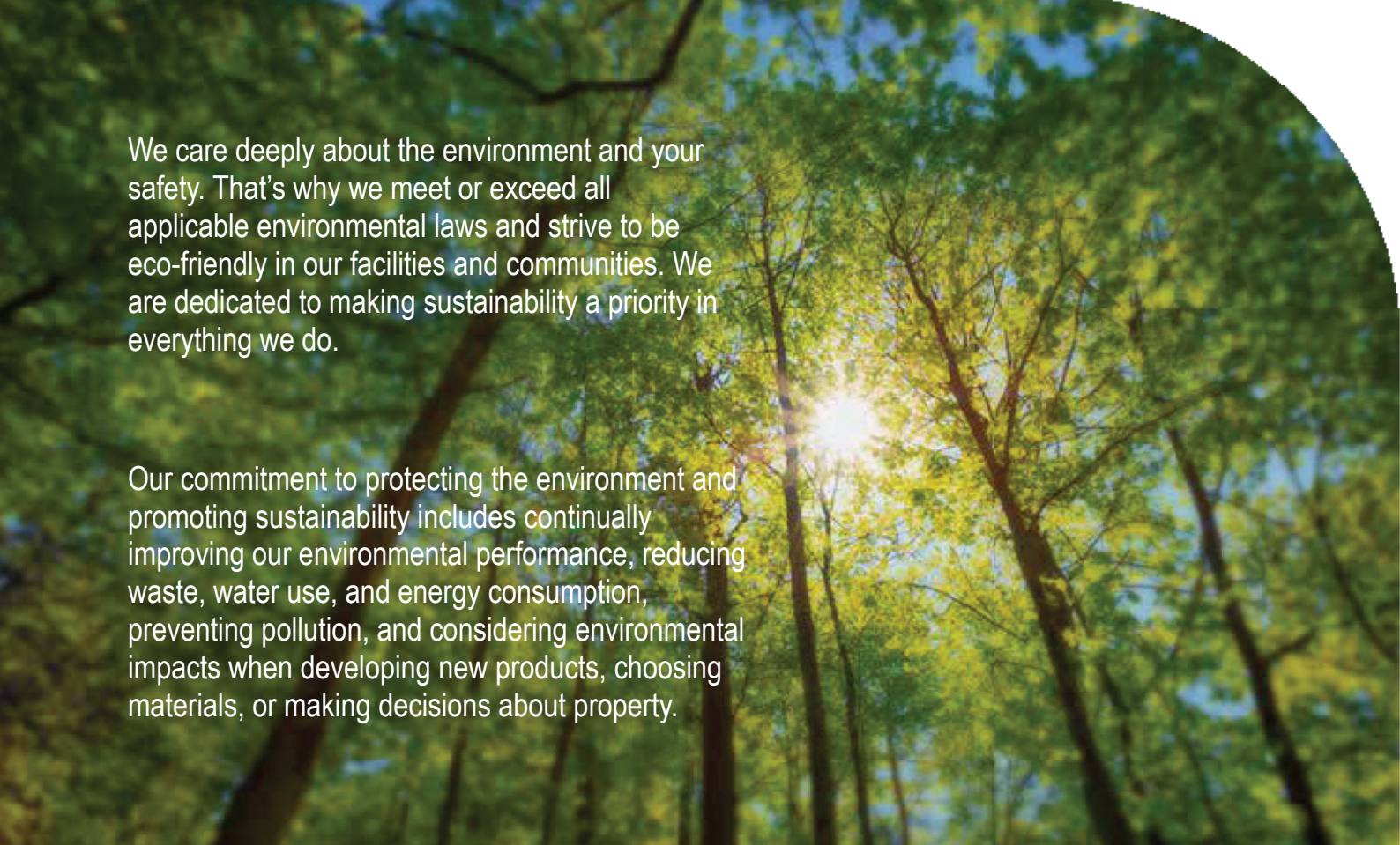
Prohibition Of Forced Labor Policy

Protection Of Juvenile Workers Policy

Wages, Overtime And Benefits Policy

Working Hours And Time Off Policy


ENVIRONMENTAL, SAFETY AND HEALTH COMMITMENTS



We care deeply about the environment and your safety. That's why we meet or exceed all applicable environmental laws and strive to be eco-friendly in our facilities and communities. We are dedicated to making sustainability a priority in everything we do.

Our commitment to protecting the environment and promoting sustainability includes continually improving our environmental performance, reducing waste, water use, and energy consumption, preventing pollution, and considering environmental impacts when developing new products, choosing materials, or making decisions about property.

We meet or exceed all applicable safety laws and go the extra mile to ensure everyone can work safely, even where specific laws might not exist. TouchPoint has zero tolerance for any form of violence. Whether it's verbal or physical threats, intimidation, vandalism, or any type of criminal behavior, it's simply not acceptable. Weapons are also not allowed on TouchPoint property unless explicitly authorized and in compliance with the law. We are committed to maintaining a safe, healthy and respectful environment for everyone.



CHARITABLE CONTRIBUTIONS

TouchPoint is proud to be a part of the communities where we operate, and we're involved in many charitable and humanitarian efforts. Our involvement can include cash donations or providing manpower and resources. When the Company supports a community project, we'll let everyone know it's a Company-sponsored initiative.

We encourage our associates to also engage in personal community activities, but just remember to do so with your own resources in your personal capacity—not as a representative of TouchPoint. Don't represent or imply that you're representing TouchPoint in any public process or forum unless you've been specifically asked to do so by management. If you're unsure about using Company resources for charitable purposes, consult our Legal Department.



POLITICAL CONTRIBUTIONS AND ACTIVITIES

In the U.S., federal and many state laws prohibit companies from making political contributions. No one at TouchPoint is allowed to make any political contributions on behalf of the Company using its funds, property, or other resources.

For state, county, and local levels, and in countries outside the U.S. where it's legal, political contributions can only be made with approval from TouchPoint's General Counsel. These contributions must be traceable, meaning they should be made by check or another method that allows us to verify the amount and origin of the contribution.

This policy only applies to corporate funds and resources. You're free to make personal political contributions or engage in political activities on your own time, as allowed by law.

MAINTAINING A DRUG AND ALCOHOL-FREE WORKPLACE

TouchPoint is dedicated to maintaining a workplace free from the use, possession, sale, or distribution of alcohol and controlled substances. Substance abuse can jeopardize health, safety, and job performance, and harm our reputation. Therefore, alcohol and illegal or unauthorized drug use are strictly prohibited on TouchPoint premises. Employees or contractor employees must not report to work under the influence of or impaired by alcohol or drugs.



OUR RESPONSIBILITIES AND EXPECTATIONS

Everyone at TouchPoint is expected to read and understand the Code, along with the guidelines and policies it includes. We all need to follow the ethical behaviors that apply to our roles at the Company. And each of us must cooperate fully and honestly with any Company investigations when asked. If you ever have questions or need help with business ethics or conduct issues, don't hesitate to talk to your supervisor, manager, Human Resources, Company officers, or the Legal Department.

For those in leadership roles—like officers, directors, managers, and supervisors—there are a few extra responsibilities:

- **Keep an eye on things and do your best to make sure everyone follows this core policy. Be approachable and open to discussing any concerns.**
- **Lead by example by demonstrating strong ethical conduct.**
- **Address any business ethics concerns that come up in your area.**
- **Help the Company protect anyone who reports an issue or assists in an investigation, ensuring that no one faces any retaliation.**

If you know about any potential violations of the law or the Code, it's important to report it. You can do this by contacting our General Counsel at +1 610-361-6773 or by speaking with your immediate supervisor, manager, regional attorney, or Company officer. They will then pass the information on to the General Counsel.

You can also report issues through the TouchPoint Compliance Hotline by leaving a voice message at +1 610-361-6500 or by email to compliance@touchpointinc.com. Employees outside of Europe can choose to remain anonymous any time you raise a concern if you prefer; however, due to various regulations in Europe anonymous reporting is not allowed there.

Rest assured, no one who reports a violation of the Code or the law in good faith will face retaliation or discipline for doing so.

Not reporting a violation, however, could result in disciplinary action, which may include termination, depending on the situation. Those who are involved in any wrongdoing or Code violations will also face appropriate disciplinary action, including possible termination.

To encourage you to seek guidance and report issues, here are a few key principles we follow:

ANONYMITY

If you're reporting a violation from outside Europe, you can choose to remain anonymous. If you request anonymity, we will respect that and won't try to identify you. Just keep in mind that it might be harder for the Company to fully investigate the issue without more information. If you are located in Europe, please be aware that various regulations in Europe discourage or prohibit anonymous reporting.

CONFIDENTIALITY

We'll do everything we can to keep reports confidential. However, there may be situations, like reporting harassment or certain legal violations, where confidentiality isn't possible.

FAIR AND THOROUGH INVESTIGATIONS

We take all reports of wrongdoing seriously and will investigate them thoroughly and fairly. The General Counsel oversees these investigations to ensure consistency and will approve the final resolution, which will be communicated back to you.

All inquiries handled by the Legal Department will be marked "Confidential" and kept secure. They won't be shared outside the Legal Department and its authorized representatives, except with:

- 1. Officers, senior members of management or Company representatives who need to know, such as outside counsel or auditors.**
- 2. Members of the Board of Directors.**
- 3. As required by law or a court order.**



Remember, our Code is all about doing the right thing.

Always act honestly, ethically, and legally. Always ask for guidance if you are unsure about anything. And always speak up if something doesn't seem right. By following our Code, we will continue to provide positive, responsible work environment where everyone has every opportunity to thrive.

Together, we will carry forward a legacy of reinvention that keeps the world running.