

Comintelli Policy on Employee Code of Conduct

This policy on Employee Code of Conduct outlines Comintelli's expectations regarding employees' behavior within our company and towards any other party with whom we may interact as part of our duties. We promote freedom of expression and open communication but we expect all employees to follow our code of conduct. This policy applies to all our employees regardless of employment agreement or rank. Company employees are bound by their contract to follow this policy while performing their duties.

Corporate Social Responsibility

As an integral part of this policy on Code of Conduct, all employees are to adhere to any and all component of Comintelli's policy on Corporate Social Responsibility.

Integrity and professionalism

All employees are to, at all times when representing Comintelli in their duties, act with the highest standards of integrity and professionalism. A Comintelli employee should be a trustworthy and entrusted collaborator with all of the company's business counterparts.

Non conflict of interest

Employees are not to have any personal, financial or other interests that might hinder their capability or willingness to perform their job duties for Comintelli or any of Comintelli's business counterparts.

Confidentiality

Comintelli employees are regularly subject to classified and confidential information from customers and other third parties. Therefore, all Comintelli employees are to, unless otherwise specifically instructed, consider any and all information about customers, customer data and personal data as Restricted according to Comintelli Policy on IT and Security.

Customer on-premise behavior and regulations adherence

Comintelli employees shall, when on customer premises, always comply with local postings and notices regarding safety, security, and weapons. Furthermore, a Comintelli employee may not, under any circumstance act "under the influence" (a person's faculties are impaired by the use of drugs or alcohol to the extent that the person is unfit to be entrusted with a duty they perform, or may be called on to perform, with efficiency and safety to themselves and others).

Protection of property

All employees should treat our company's, customers' suppliers' subcontractors' and partners' property, whether material, intangible or incorporeal, with respect and care. Employees shouldn't misuse any such equipment or use it frivolously. Employees should protect facilities and other material property from damage and vandalism, whenever possible.

Personal appearance

Comintelli employees adapt their personal appearance according to the situation. “Board room appearance” when called for and “business casual” as the general company standard. When visiting customer or other party’s facilities, employees are always to inform themselves regarding local dress codes and dress accordingly.

Sexual Harassment

Comintelli is committed to providing a safe environment for all its employees free from discrimination on any ground and from harassment at work including sexual harassment. Comintelli will operate a zero tolerance policy for any form of sexual harassment in the workplace, treat all incidents seriously and promptly investigate all allegations of sexual harassment. Any person found to have sexually harassed another will face disciplinary action, up to and including dismissal from employment. All complaints of sexual harassment will be taken seriously and treated with respect and in confidence. No one will be victimized for making such a complaint. Anyone can be a victim of sexual harassment, regardless of their sex and of the sex of the harasser.

Definition of sexual harassment

Sexual harassment is unwelcome conduct of a sexual nature which makes a person feel offended, humiliated and/or intimidated. It includes situations where a person is asked to engage in sexual activity as a condition of that person’s employment, as well as situations which create an environment which is hostile, intimidating or humiliating for the recipient.

Sexual harassment can involve one or more incidents and actions constituting harassment may be physical, verbal and non-verbal. Examples of conduct or behavior which constitute sexual harassment include, but are not limited to:

Physical conduct

- Unwelcome physical contact including patting, pinching, stroking, kissing, hugging, fondling, or inappropriate touching
- Physical violence, including sexual assault
- Physical contact, e.g. touching, pinching
- The use of job-related threats or rewards to solicit sexual favors

Verbal conduct

- Negative comments on a worker’s appearance, age, private life, etc.
- Sexual comments, about a worker.
- Sexual advances
- Repeated and unwanted social invitations for dates or physical intimacy
- Insults based on the sex of the worker

Non-verbal conduct

- Display of sexually explicit or suggestive material
- Sexually-suggestive gestures
- Whistling

Guns and arms

Comintelli employees may not, under any circumstances, while carrying out work for Comintelli or Comintelli's customers, carry weapons or ammunition onto any premises or use or carry weapons while attending activities sponsored by Comintelli or any of Comintelli's customers, partners or subcontractors.

Smoking

Smoking is not permitted at any of the Comintelli's workplaces and employees of Comintelli are to adhere to any local instructions regarding smoking when on any third party premises in the capacity of Comintelli employee.

Drugs

Comintelli is a drug free workplace and applies a substance abuse prevention policy that provides for post-offer/pre-employment and/or pre-assignment drug screening as well as for reasonable suspicion testing of Personnel in accordance with applicable federal, state, and local law. Key elements of this policy are as follows.

Employees must not:

- attend work, commence work, continue work or return to work while under the influence of alcohol and/or illegal drugs;
- consume alcohol and/or drugs during work, or at the workplace (with the exception for prescription and pharmacy drugs when used according to qualified instructions and, in the case of alcohol, during approved entertainment events);
- possess, distribute, sell, use or consume illegal drugs in the workplace.

A worker, who is required to undertake a Drug Screen Test and/or Alcohol Screen Test, will be requested to sign a consent form before taking a Drug Screen test and/or Alcohol Screen test. All information obtained through such testing is covered by applicable privacy laws. The Company will not use this information other than for the purposes for which it is collected. The purposes of such monitoring and examination are to ensure the productivity, health and safety of personnel, to apply this policy, and for disciplinary purposes.

If an employee notifies the Company that they have a drug or alcohol problem, they will be encouraged to complete a rehabilitation program or undergo counselling.

Employee warranty

Employees of Comintelli further warrant that they have not:

- been convicted of a felony or for whom a warrant for a felony charge is outstanding, or for whom a felony charge is currently pending;
- been convicted of a misdemeanor or for whom a misdemeanor is currently pending where the nature of the conviction or pending charge presents a risk of harm to person or property;
- been convicted of any crime involving violence (including assault), sexual misconduct, theft, burglary, fraud, financial or similar crimes involving dishonesty, computer crimes, drug distribution, or crimes involving the unlawful possession or use of a dangerous weapon;
- been convicted of any "Sex Offender" crime or is identified on a government registry as a sex offender;
- failed a drug test;

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- falsified information or failed to present necessary information in the hiring process. Information includes, but is not limited to, date of birth, Social Security Number, employment history, educational history, driver's license, home address, citizenship status and name;
- had a history of workplace violence (including threatening others or causing a disturbance).

Employee training and compliance with this and other Comintelli policies

The Company will inform and conduct training or information sessions for all employees, relating to this and other Comintelli policies, including but not limited to the consequences of breaching this policy. Where appropriate, the Company will conduct induction sessions for agents, contractors and their respective employees when they undertake work for Comintelli in the workplace.

Any employee found to have breached this, or other Comintelli policies, may be subjected to disciplinary action. The type and severity of the disciplinary action will depend upon the circumstances of the case and the seriousness of the breach. In serious cases, this may include termination of employment.

Partners and/or subcontractors of Comintelli who are found to have breached this, or other Comintelli policies, may have their contracts with Comintelli terminated, or not renewed.