



GUIDEPOINT GLOBAL, LLC - CODE OF CONDUCT

INTRODUCTION

Guidepoint Global, LLC (“Guidepoint” or the “Company”) strives to conduct business in an ethical and honest manner and in compliance with all applicable laws and regulations. The principles stated in this Code of Conduct (the “Code”) apply to all aspects of Company’s business. It is crucial that our employees and business partners (Advisors and vendors) recognize the roles they play as critical participants in fulfilling our commitment to compliance and integrity.

This Code sets forth the principles and ethical standards that Guidepoint strives to achieve. Guidepoint expects its employees and business partners to acquaint themselves with its contents and adhere to the standards set out in this Code as well as all applicable laws and regulations in effect anywhere they operate.

ETHICAL BUSINESS PRACTICES – Guidepoint’s policies require compliance with all applicable laws, rules and regulations (domestic and international). All business dealings should be fair, legal, and honest.

ANTI CORRUPTION – Guidepoint is committed to conducting its business in accordance with the highest ethical standards and to having policies in place that prohibit the misuse of company assets, corruption, bribery, improper gifts, extortion, and embezzlement.

CONFLICTS OF INTEREST – Guidepoint employees and business partners are expressly prohibited from engaging in business dealings that actually create or appear to create a conflict between the interests of Guidepoint and the employee/business partner.

PROFESSIONALISM – Guidepoint requires that all interactions among its employees and business partners, and between its employees and business partners and Guidepoint’s clients, be professional, respectful, and consistent with the highest industry standards. Under no circumstances should any abusive, antagonistic, offensive, dismissive, disrespectful or otherwise inappropriate language be used in oral or written communications.

PRIVACY – Guidepoint processes personal data confidentially and responsibly and seeks to ensure that personal data is effectively protected and used only for legitimate purposes. For details, please see <https://www.guidepoint.com/privacy-policy/>.

LABOR AND HUMAN RIGHTS – Guidepoint is committed to observing fair labor practices and to treating its employees with dignity and respect. Guidepoint seeks to support human rights among its employees

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and throughout its business partner network by embracing and encouraging behaviors and practices that are consistent with the principles below:

- (i) **Human Rights** - Guidepoint respects the right of employees to freely associate and prohibits discrimination and harassment. Guidepoint further supports and respects the protection of human rights and is committed to ensuring that it is not complicit in human rights abuses.
- (ii) **Human Trafficking** - Guidepoint is committed to acting responsibly and supporting the objectives of the Modern Slavery Act (please see Guidepoint's Modern Slavery Act statement available at: <https://www.guidepoint.com/>) and complying with all regulations prohibiting human trafficking in any country or countries in which it operates.
- (iii) **Forced Labor and Child Labor** - Guidepoint is committed to prohibiting any forced labor in its organization and business partner network.
- (iv) **Health and Safety** – Guidepoint is committed to providing a safe and secure work environment for its employees.

EQUAL OPPORTUNITY, DIVERSITY, AND INCLUSION – As a global company, Guidepoint values and encourages diversity and inclusion. It has been and will continue to be a fundamental policy of Guidepoint not to discriminate on the basis of race, color, creed, religion, gender, gender identity, pregnancy, marital status, partnership status, domestic violence victim status, sexual orientation, age, national origin, alienage or citizenship status, veteran or military status, disability, handicap, genetic information or any other characteristic protected by federal, state or local law. Guidepoint recruits, selects, and promotes employees based on their qualifications, skills, aptitude and attitude. This anti-discrimination policy extends to all aspects of Guidepoint's business, including the selection of employees, Advisors, and vendors.

ENVIRONMENTAL IMPACT AND SUSTAINABILITY – Guidepoint is committed to doing its part to protect the Earth's natural resources by conserving energy and water, reducing waste and using green products when possible. Guidepoint complies with all applicable environmental laws and continually develops internal programs designed to foster a culture of sustainability and the use of environmentally friendly technologies and processes.

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ACKNOWLEDGEMENT

We require our business partners to confirm that they will adhere to the Code of Conduct as applicable to them and/or their organization. If our business partners become aware of any breaches with respect to any matters referenced herein, and particularly those that could harm Guidepoint's reputation directly or by association, they are required to cease such conduct and inform Guidepoint immediately.

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