

ALTA RESOURCES

Code of Business Conduct & Ethics

Working together under our Guiding Principles





Letter from Jim

Every day, Alta Resources defines itself through the actions of our front line and our leadership. Integrity is central to who we are, and my expectation is that we do the right thing, every time. This is required of all of us here at Alta under our Strategic Mandate of Reduced Risk and in accordance with our S.A.F.E. (Securing Alta's Future Environment) initiatives.

Alta Resources' Code of Business Conduct & Ethics is the cornerstone of our Ethics and Compliance Program. It guides our actions, our decisions and our operations. By understanding and following the Code, you help safeguard Alta's integrity and reputation as an ethical, caring company focused on its employees and its customer relationships.

Our Code of Business Conduct & Ethics is grounded in our Guiding Principles:

- Results
- Diversity
- Relationships
- Integrity
- Communication
- Community
- Strength

Living these Guiding Principles means holding ourselves accountable. If you identify something you believe is not in accordance with our Guiding Principles, listen to your inner compass and speak up. We cannot improve upon or fix issues if we are not aware of them.

By embracing these Guiding Principles in our day-to-day jobs, Alta's clients know they can depend on us to provide their customers with high-quality, personable and professional service. Our success is built on the trust, mutual respect and confidence in interactions amongst ourselves and those of whom we serve. Let's continue to strengthen these relationships by doing the right thing - always. I know I can count on you to do the right thing and continue our reputation as one of the world's most trusted and respected companies.

Thank you for your dedication to Alta Resources.

Respectfully,

Jim Beré
President & CEO

Our Mission

As a leading customer-management business process outsourcer, we provide resources and create solutions that maximize customer relationships.



Our Guiding Principles form the foundation on which we perform our work and conduct ourselves – every day.

Results

Great companies partner with Alta because we deliver defined results, and do so with passion, focus and a sense of urgency.

Diversity

We foster diversity – different backgrounds, different cultures and different points of view – to fuel the solutions and results we deliver for our clients.

Relationships

We are successful because of the strong, lasting relationships we build with each other, those we serve and our business partners.

Integrity

We are – individually and collectively – trustworthy, high in character, accountable and proficient, demonstrating respect and honesty in all that we do.

Communication

We communicate openly, honestly, appropriately and responsively – internally and externally – to ensure needs are understood, accountability is clear, information is shared and ideas are heard.

Community

We balance work and family and contribute positively to our communities.

Strength

We must be financially strong to invest in the people, technology, quality and capabilities necessary to create solutions and deliver results for our clients, now and in the future.



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COMMUNICATION:

ACCOUNTABILITY TO OUR CODE AND YOU



Why We Have a Code and Using It

It's not enough to just obey the law; ethical practices hold us to a higher standard

Our Code of Business Conduct & Ethics is managed by Alta's General Counsel & Chief Compliance Officer (CCO).

Our Code of Business Conduct & Ethics

This Code is a common-sense guide to help you make good business decisions.

It applies to everyone at Alta Resources, including senior leadership. Each of us is expected to read, understand and follow our Code. It will help you:

- Resolve difficult questions about conduct on the job
- Apply the policies and laws that control and guide our business
- Work with your fellow employees, customers, business partners, competitors, regulators, vendors and suppliers
- Identify and report suspected illegal or unethical behavior

We expect our suppliers, vendors, contractors and business partners to be familiar with our Code and support effective compliance programs within their own organizations.

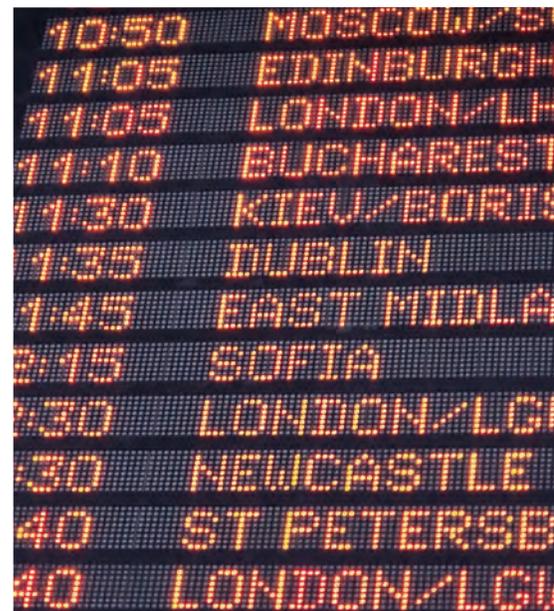
This Code is a living document and will change over time. However, it is not an employment contract between you and Alta.

In addition to this Code, Alta has policies and procedures describing how to apply the law to our business operations. You are expected to know and follow the policies that apply to your work. All of Alta's policies are available to our employees on our intranet [PolicyTech site](#). We offer online training about our Code and policies to help you understand these concepts. The content of our Code is governed by Alta's policies. In the event this Code is in conflict with Alta's policies, the policies will govern.

Doing Business Around the Globe

Each of us must respect and obey the laws of the cities, states and countries in which we operate. However, complying with the law is not our only responsibility. Not only should we consider what the law permits us to do, but also what is the "right thing to do." Our Code of Business Conduct & Ethics reflects Alta Resources' commitment to obey laws as well as respect the principles upon which those laws are based.

The sheer complexity of laws and regulations can make it difficult to make a good decision. In some instances, there may be a conflict between the laws of two or more countries. If you have a question about the right course of action to take, contact our Legal department. Just because the laws are complicated or hard to follow does not mean we are excused from complying.



A Higher Expectation of Managers

As a manager at Alta, you are held to a higher standard. Lead by example. Be a coach and mentor.

Managers are role models and lead by example. Employees often rely on their manager for guidance in difficult situations and should feel comfortable in doing so.

Managers help create and foster an ethical and compliant corporate culture. They should encourage employees to bring concerns to their attention.

Managers are expected to:

- Talk openly about ethical behaviors with your team whenever possible
 - Alta's S.A.F.E. Monthly Awareness Message is a great way to "kick off" such discussions
- Maintain an "open door" policy so your team feels comfortable bringing concerns to you
- Periodically remind employees about our non-retaliation policy
- Ensure associates know the importance of reporting concerns
- Embrace Alta's Code of Business Conduct & Ethics, and be an example of an ethical leader
- Provide leadership and support, including contacting Human Resources or the Legal Compliance team when suspected or observed misconduct is reported to you
- Enforce the Code and apply consistent corrective and disciplinary action for violations



Maintain an Ethical Workplace

If you are a supervisor, you are responsible for the actions of your employees. You have a special responsibility to create an environment where ethical and legal behavior is expected.

Lead by Example

As a supervisor, you must make sure your employees understand and apply the ethical standards set out in the Code. You must also set a personal example of high ethical standards in your daily work. Be patient, kind and act as a coach.

Listen

Listen to your employees' concerns. Make sure your employees feel comfortable voicing their concerns by maintaining an open door policy. Let employees know you are always available to listen to their concerns and help them make a good faith report.

Take Prompt Action

If an employee does come to you with a concern, you have an obligation to report that issue to Human Resources or our Legal Compliance team in a timely manner. Never investigate the matter yourself, and do not tolerate retaliation against the reporting employee by others. Any known retaliation must be reported immediately to Human Resources or our Legal Compliance team.



INTEGRITY:
RESPECT AND HONESTY IN ALL WE DO

Where to go for Advice and Reporting Concerns: Our Ethics Hotline

Alta Resources employees have an obligation to report ethical and compliance problems or concerns. While your supervisor is usually your first and best resource for questions and concerns, you do have other options available, such as Alta’s Ethics Hotline. The Ethics Hotline allows you to seek guidance or report any concerns by calling toll-free, 1.855.845.3450 or reporting through a web portal at AltaResources.EthicsPoint.com.

All calls can be made anonymously (if you prefer) and without fear of retaliation. Both the call and web intake systems are supported by a 3rd-party company who is one of the largest and most respected providers of such services in the world. When you call, we encourage you to provide accurate, complete information to assist us with an investigation. Be prepared to describe:

- The situation, including when and where it occurred
- How you know about the situation
- How the situation occurred (e.g., if a procedure was violated or instructions were given, dates and times of occurrence)
- Anyone else who observed the situation or anyone you have talked to about it
- Who or what might be affected
- Any documents or evidence to support your report

Though anonymity is an option for you when reporting via Alta’s Ethics Hotline, we encourage employees to include their identity as it results in an more thorough and complete, internal investigation.

After making a report, make sure to obtain your report and pin numbers. Having these case identifiers allows you to follow up on the reported incident; submit additional facts and evidence; and even have an anonymous chat with the assigned lead investigator.

If you’re faced with an ethical dilemma and you’re not sure what to do, ask yourself:

Does the action align with Alta’s guiding principles and brand?	Is the action legal?	Does it feel like the right thing to do?	Would I feel comfortable with family members or friends reading about it on the internet?	Do I know what company policies apply and their requirements?
Do I know for certain my proposed actions are legal & consistent with the letter & spirit of the law as well as company policies?	Have I consulted with the appropriate company subject matter experts?	Would the action promote the best interests of Alta, our clients, fellow employees and other company stakeholders?	Would I be comfortable allowing the situation to continue?	Would I be treating others the way I want to be treated?





Whistleblower Procedures

Alta Resources has adopted whistleblower procedures for the receipt, retention and treatment of complaints that may have regulatory compliance components to them. For more information, please contact Alta's General Counsel & Chief Compliance Officer. If you would like to report a concern anonymously, please contact the [Ethics Hotline](#).

Non-Retaliation

At Alta, we do not tolerate any form of retaliation against anyone who makes a good faith report of potential misconduct or helps with an investigation. Acting in "good faith" means that, to your knowledge, you are making an honest and complete report. We want you to be free to seek guidance or report concerns without fear of retaliation, secure in the knowledge you did the right thing in coming forward.

If you believe you or someone else has experienced retaliation, you should contact Human Resources-Employee Relations, the General Counsel & CCO or CorporateCompliance@AltaResources.com. Anyone engaged in retaliation against an employee for any reason will be subject to disciplinary action, up to and including termination.



Investigation of Reports

Alta Resources is committed to taking all reports seriously. All issues are documented and, if appropriate, investigated. Each of us has a responsibility to cooperate fully with any Alta Resources investigation. Appropriate actions are taken based on the investigation findings and resultant disciplinary action is equitably and fairly applied throughout our organization.

Disciplinary Action

Anyone who violates Alta's Code of Business Conduct & Ethics - or who knowingly permits another to do so - may be subject to disciplinary action, up to and including termination.



"I observed a situation that I suspect violates our Code or policies, but I'm not certain. Should I report the matter?"

Yes. You are not only expected, but required to report any known or suspected violations right away. You will not experience retaliation for making a report in good faith, regardless of whether your report is supported or validated. Reporting in good faith doesn't mean that you have to be right. It simply means that you are making an honest and complete report. Note: Failure to report may result in you receiving disciplinary action against you.

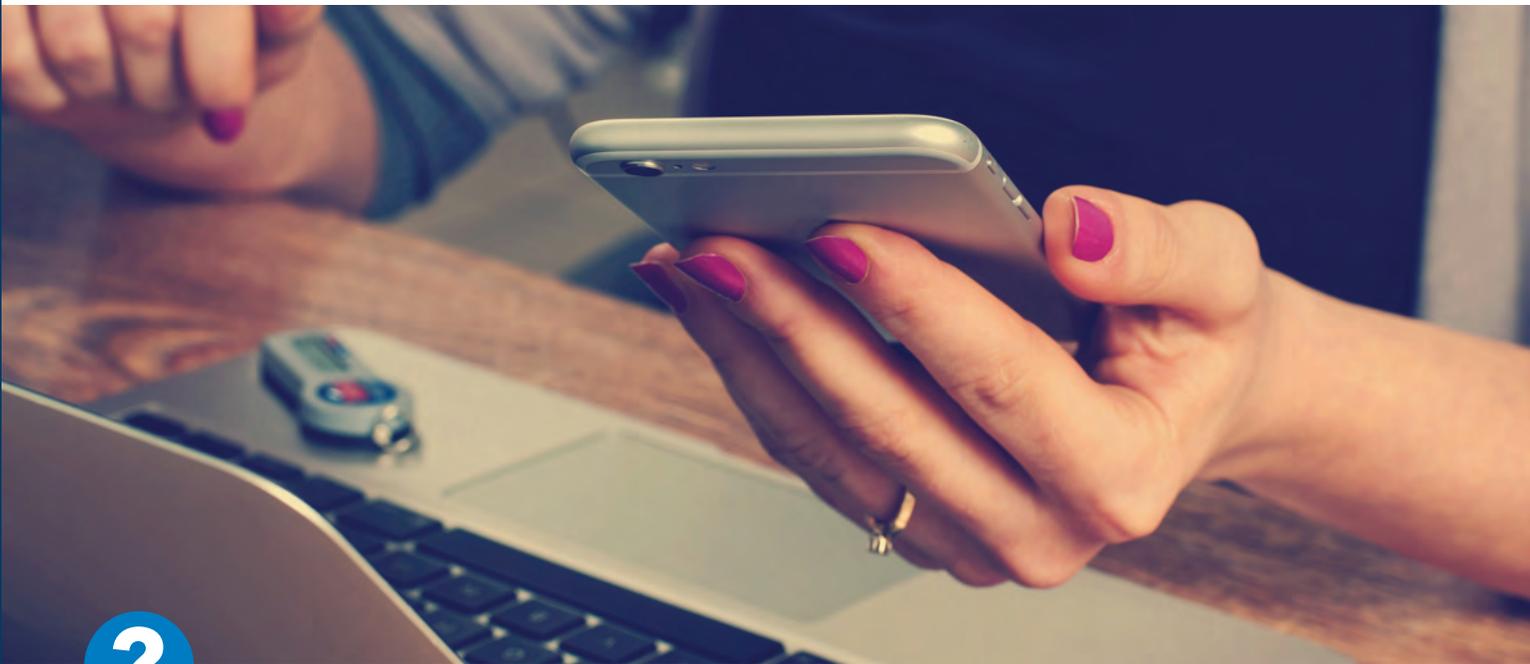


Additional Details About the Ethics Hotline

Hotline calls are not traced. The information is treated in a confidential manner, subject to legal limits. Reported issues will be addressed and action taken appropriate to the seriousness of the violation. We handle investigations confidentially and have a policy of non-retaliation against anyone who makes a good faith call. This includes calls from consultants, temp-agency employees, customers, providers, vendors, producers and other entities with whom we do business. Any employee who violates this policy will be subject to disciplinary action up to and including termination.

The Ethics Hotline should not be used as a substitute for talking to your local management team, Senior Management or other corporate resources. Use this tool when you believe you have exhausted normal company channels or feel uncomfortable talking to your supervisor or other corporate resources.

The Ethics Hotline is available 24 hours a day, 7 days a week.



"Will I be informed about whether or not my concern was investigated and what the outcome was?"

All Ethics Hotline calls are taken seriously. We handle investigations discreetly and professionally. Feedback may be limited because we are obligated to protect the rights of everyone involved.

"I am concerned that I am the only person who witnessed a co-worker's misconduct. If I report it, he will know it was me. I'm afraid to call, but should I anyway?"

Yes. Alta has a policy prohibiting retaliation against anyone for making a call in good faith. Do not ignore this activity. Speak up!



**DIVERSITY:
OUR COMMITMENT TO FOSTER
& EMBRACE OUR DIFFERENCES**



Respect in the Workplace

Fairness, Dignity and Respect

Our greatest asset at Alta is our employees. We rely on them to create a healthy and productive workplace culture. This is largely achieved through respect and kindness toward coworkers. Alta is committed to a work environment where everyone is afforded the dignity and respect they deserve.

Alta's Guiding Principles demand we set higher expectations than legally required. We expect our employees to treat others just as they would want to be treated.

For more information, please consult our Employee Handbook: [US Handbook](#); [PH Handbook](#).

One of our goals at Alta Resources is to promote professional development. We do this by providing opportunities for employees to develop and advance in a manner consistent with their abilities. Any decisions related to hiring, performance evaluations, promotions, disciplinary actions or terminations, are made fairly, with discretion and respect for privacy.

Solicitation and Distribution of Materials

Solicitation of coworkers or the distribution of non-work related literature or materials during work time and in work areas is not permitted. Most Alta locations have common areas like kitchens or cafés where such postings may be appropriate. However, before utilizing these common areas for personal interests, you are asked to discuss the matter with a Human Resources representative first.

"Distribution" includes the dissemination or posting of literature, pamphlets, chain letters, personal business cards or other written or printed material of any kind, as well as email. In addition, the use of office supplies for non-company-sponsored solicitation activities is prohibited.

Discrimination and Harassment

We build trusting relationships through our commitment to treating our fellow employees, members, suppliers, contractors and business partners with dignity and respect. We strive to avoid engaging in any activity or conduct - on or off the job - that could harm Alta or distract us from serving the needs of clients and their consumers.

Alta Resources is committed to providing employees with a work environment free of discrimination and harassment. We do not allow any form of harassment or discrimination on the basis of race, religion, color, sex, sexual orientation, gender identification, national origin, age, marital status, covered veteran status, disability, pregnancy or any other basis prohibited by applicable law. If you see or suspect any violation, or feel you are a victim of harassment or discrimination, promptly report it.

Remember, words are very powerful. They can both build co-workers up and tear them down.





Examples of harassment include:

- Epithets, derogatory comments or slurs
- Derogatory posters, screen savers, backgrounds, cartoons, drawings or gestures
- Assault, intentional blocking or interfering with normal movement
- Inappropriate words, labels or symbols used as IDs, passwords, computer sign-offs or greetings
- Threats and demands of a sexual nature in order to maintain employment or avoid some other loss, and offers of job benefits in return for sexual favors



"I overheard a co-worker use insulting language when referring to someone on our team. What should I do?"

Language that is disrespectful of a person's race, religion, color, sex or any other protected class doesn't fit in a workplace that values diversity. If you feel comfortable doing so, say something to your co-worker to express your concern. If you don't, speak to your supervisor, a Human Resources representative or call our Ethics Hotline. Each of us is a valued member of the team.

Sexual Harassment

Sexual harassment is prohibited. It may take many forms, including unwelcome sexual advances, requests or demands for sexual favors and other visual, verbal or physical conduct of a sexual or gender-based nature when:

- Submission to or rejection of such conduct is used as a basis for employment decisions such as, but not limited to, promotions, transfers, appraisal ratings, corrective action
- Submission to such conduct is made either explicitly or implicitly a term or condition of employment
- Such conduct has the purpose or effect of unreasonably interfering with an associate's work performance or creating an intimidating, hostile, or offensive work environment

Examples of sexual harassment include:

- Unwelcome sexual advances, propositions or requests for sexual favors
- Unwanted physical contact including touching, rubbing or brushing up against another
- Verbal harassment such as suggestive comments, sexual innuendos and jokes of a sexual nature
- Nonverbal conduct such as obscene gestures, leering, whistling, displaying or circulation of sexually suggestive objects or pictures
- Aggressive, intimidating or "bullying" conduct directed toward someone because of their gender, even if not in a sexual nature



**COMMUNITY:
COMMITMENT TO THE COMMUNITIES
IN WHICH WE WORK**



4

COMMUNITY: COMMITMENT TO THE COMMUNITIES IN WHICH WE WORK

Supporting Our Communities

Community is more than just a place. It's our cultural identity. It's our home. It's where we work, raise families and entertain friends.

Our Guiding Principle of Community expresses our vision for us all to be active participants in our communities: "We balance work and family and contribute positively to our communities." To help us live by that principle, Alta Resources developed an outreach program called AltaHOPE™.



AltaHOPE (Helping Others Prevail Everywhere) is designed to make us champions of community involvement and to help us impact the wellbeing of the places we live, work and play. Thanks to the common threads of hope and care that weave through us all at Alta Resources, physical goods and thousands of dollars are raised each year, then donated to local charities. We continually sponsor community events and volunteer our time and talents to help others. And, we're continually creating awareness of important causes.

Getting Started

Employees actively involved with a qualified non-profit may request a donation. Please review the donation guidelines on Alta's employee portal, located under Requests & Donations, before submitting a request. All requests, if approved, are awarded quarterly. If you have any questions, regarding the AltaHOPE program, please ask your leader or reach out to the [AltaHOPE mailbox](#).

Charitable and Volunteer Activities

Alta Resources also encourages employees to get involved and make a difference in their respective communities. Participation in community activities as a private citizen, using your own time and money for causes you care about (such as your church, your children's school, or the non-profit agency of your choice), is a great way give back on a personal level. Do not use, without specific authorization, Alta funds or resources to help promote any charitable cause, political party or candidate. Please remember that all volunteer activities are to take place on your own personal time unless authorized as an Alta-endorsed employee activity during work hours with pay.

Participation in Alta volunteer programs promoting team-building and a significant community impact are also encouraged. In addition, Alta provides opportunities for employees to come together and contribute financially to help address needs within our local communities through events such as the United Way, March of Dimes, community blood drives, Fr. Al's Children's Foundation and Haribon Foundation.





An International Presence

We are all dedicated to delivering quality services to our clients and their customers. Having an international presence places upon Alta the responsibility to understand and respect the cultures and communities where we operate our business throughout the world. While we are bound by U.S. laws and regulations and company policy, we recognize that, as we grow, we are introducing a new corporate culture and, perhaps, different business practices in countries all across the globe. We count on every employee to follow the letter and the spirit of those U.S. laws that may apply (for example, the Foreign Corrupt Practices Act) and maintain an awareness of - and sensitivity to and commitment to observe - differing legal requirements from country to country.

Speaking on Behalf of and Representing Alta Resources

Our company conducts business in many parts of the world and the public expects the information we provide to be accurate. It's critical that information provided to the public is complete, consistent and accurate and also that confidential information is protected.

Unless you are an authorized company spokesperson, don't speak on behalf of Alta. Instead, refer the individual to one of the following:

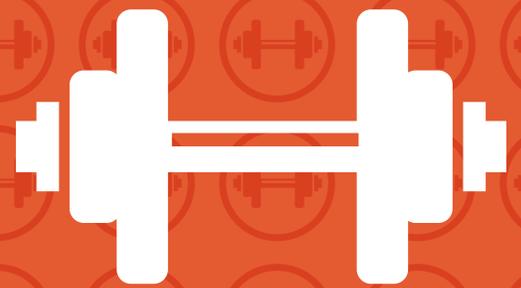
- For media inquiries, contact Alta's Marketing department
- For questions regarding financial performance, contact Alta's Chief Financial Officer
- For legal issues, contact Alta's General Counsel



"A local reporter approached me at work and asked me to comment on a rumor circulating about our company. It was a great opportunity to set the record straight, but I didn't think I should say anything."

Your instincts were right. Unless you are an authorized representative, you should not speak on behalf of the company. Direct the reporter to Alta's Marketing department.





STRENGTH:
**OUR COMMITMENT TO OUR PEOPLE,
TECHNOLOGY, QUALITY & CAPABILITIES**

Conflicts of Interest

A conflict of interest occurs when your personal concerns interfere with those of Alta. A conflict of interest may also arise when your personal interests adversely affect your business judgment or job performance. We avoid conflicts of interest because they can cause serious problems for you and can possibly damage Alta's reputation. We need to avoid even the appearance of a conflict of interest.

You should base business decisions on Alta's needs rather than your own personal interests or the interests of your friends or family. Unless approved by Alta's Legal Compliance team, you should not secure Alta business relationships with companies in which you, or members of your immediate family, have a substantial financial interest.

In addition, neither you nor your immediate family should own a substantial financial interest in any organization doing business with or competing with Alta, unless approved by Alta's Legal Compliance team.

If you have any doubt about whether a conflict of interest exists, follow these three steps:

- Recognize that there may be a conflict of interest
- Disclose and explain the situation to your supervisor, a Human Resources representative or the Legal department
- Get advice and, when called for, remove yourself from all decision making about the situation



"When my department hosts special events, my team puts me in charge of catering because my daughter-in-law owns a local restaurant that provides great food at a discount. Is that okay?"

No, even if the restaurant offers a great meal at a great price, selecting your daughter-in-law's business without prior approval from the Legal Compliance department may give the appearance we chose her business because of your family connection.

Regarding conflicts of interest:

1. You must disclose to Alta's Legal Compliance team significant financial interests you or your immediate family has in our suppliers, customers or competitors.
2. A conflict of interest may also arise if outside work (including sitting on for-profit and not-for-profit boards) interferes with your ability to fulfill your responsibilities to Alta, or if there is a risk that the outside employment may cause you to disclose confidential or proprietary



information or trade secrets. Each of us is expected to use good judgment and avoid situations that can lead to even the appearance of a conflict.

If you or your immediate family serves as an officer, consultant, or board member of any company that transacts business with Alta, you must disclose these obligations to the Compliance Officer or General Counsel and get approval. When you disclose your organizational relationships, we can determine whether you are in a position to unduly influence either the decisions of the outside organization or Alta. We can provide advice on how to resolve the situation fairly.

3. Business opportunities are company assets. Alta will grow and prosper by cultivating customers and pursuing new leads. Do not take personal advantage of business opportunities you discover using Alta's resources. Alta employees should not compete against Alta. Each of us should advance Alta's legitimate interests whenever we can.

Accuracy of Company Records

Accurate and complete recordkeeping is essential to the successful operation of Alta Resources, as well as to our ability to meet our legal and regulatory obligations. You have a responsibility to be accurate, complete and honest in what you report and record to meet regulatory requirements. This also holds true for all company documents, including accounting records, time cards, expense reports, invoices, payroll records, safety records, business records, performance evaluations, etc.

If you see or suspect financial misconduct, notify your supervisor immediately or contact Alta's Legal Compliance department.

Always remember it is wrong to:

- Inaccurately record time for reporting purposes
- Falsify quality, environmental or safety reports
- Process or submit false or inaccurate invoices
- Record false sales or expense reports
- Understate or overstate known liabilities and assets
- Defer or accelerate recording of transactions in incorrect periods
- Alter, remove or destroy company documents except in accordance with our records management policy
- Use company property for personal gain or benefit

It is also every employee's responsibility to comply with company policy when it comes to retaining, storing and disposing of company records. Alta's records management and retention guidelines and policies ensure we maintain the records necessary to meet legal, tax and regulatory requirements. Additionally, they help make sure secure disposal of records no longer needed occurs. Take care never to dispose of information that may be relevant to current or threatened litigation or subject to a legal hold until you are authorized in writing to do so by our Legal Compliance team.

Fraud

Fraud can range from minor employee theft to significant misstatement of Alta earnings and holdings. Material or financial fraud can have an adverse effect on our reputation. Fraud is often accompanied by collusion and stealth.



Confidentiality and Privacy

Our company information is a valuable commodity. Each of us must protect the confidentiality of information about Alta Resources' employees, clients and business partners, both inside and outside of the company. This includes sensitive information specific to Alta employees.

It's up to you to take precautions to avoid improper, inappropriate or inadvertent disclosures of confidential or privileged information, records and documents. Only share this information with employees who have a legitimate business "need to know." When doing so, only share the minimum info necessary.

We must protect the confidential information of our clients, their customers, providers and any other individual's sensitive information we possess. This includes employees' personal information and other particularly sensitive information. This information can only be shared with authorized personnel.

Follow all federal and state laws, corporate and departmental policies and procedures for handling sensitive information. These protections extend both inside and outside of Alta Resources including payment card information (PCI), protected health information (PHI) and personally identifiable information (PII).

We must protect the privacy of individuals' health and sensitive information because:

- Improper uses and disclosures can invade someone's privacy, damage his/her reputation, cause embarrassment or identity theft, violate federal and state privacy laws and could expose Alta to lawsuits. Violations of law carry serious penalties, possibly for both individuals and companies.
- Improper use may violate Alta's agreements or contracts with clients, business partners or government agencies.

Alta Resources often needs to retain sensitive personal information and other information about individual employees as a part of doing business. Help maintain the confidentiality of this information and limit access to authorized persons who need the information for business or legal purposes.

Do not disclose business confidential information, also known as Intellectual Property and Trade Secrets, to unauthorized third parties or to employees unless those employees must have it to perform their duties.

Never give confidential or proprietary Alta information to competitors, suppliers, outside contractors or anyone else without proper authorization. This includes information regarding financials, customer lists, discounts, special prices, computer data, computer programs and descriptions of company processes or operations. Do not discuss potential business relationships, purchases, mergers, acquisitions or other organizational changes except on a "need-to-know" basis. Also, protect the information used to access all systems used at Alta Resources including passwords and other personal security codes. Never share your login credentials.

Store all company documents and files on corporate servers, so they may be recovered and accessed by the proper individuals. Whenever an authorized Information Technology technician works on your computer, you must be present to enter your password and provide oversight.

Although our company is not publicly traded, many of the companies we do business with are. During the course of your employment, you may become aware of "insider information." It is against the law to use this information for Alta's or your own financial gain. Also, do not "tip" others by sharing such information with them.



Protecting Company Assets

Alta's assets - informational, physical, financial or technological - are essential to operating our company successfully. You have a responsibility to use them to perform Alta Resources business and safeguard them against theft, loss, waste and abuse.

Be sure to exercise good judgment when using electronic resources at work. Usage should be lawful and ethical, and you should never download or send materials that might be considered offensive, discriminatory, sexually explicit, threatening or otherwise inappropriate. Do not use Alta email to express a personal view in a public forum.

Each of us has a responsibility to ensure Alta's electronic resources remain secure. Your login credentials, ID and password are intended for your use only. You are responsible for the actions resulting from the use of your ID and password. Do not share your ID and password or let others use your computer while you are logged on. This protection is important because:

- All of our information security mechanisms utilize user IDs and passwords to authenticate an individual's identity and establish approved access and rights
- If multiple individuals have access to the same user IDs and passwords, it is impossible to tell who did what
- Often, our license agreements with system vendors allow only a certain number of users

Physical access to Alta facilities and client production areas should be limited to authorized personnel. Each of us has the responsibility to display our security badge at all times and ensure non-employees are properly authorized before coming on site. If you see someone and are uncertain if they are authorized to be on premise, notify your supervisor.

Social Media

When communicating through social media, such as Facebook, Twitter or Instagram, be mindful of your responsibilities as an Alta employee to protect confidential information and to abide by Alta's policies, procedures and corporate standards. In general, remember:

- Only employees authorized to do so may speak on behalf of Alta.
- You are responsible for the content of your public posts, so use good judgment, and avoid posting pornographic or similarly offensive material.
- Be aware of the perception you might create for our brand and yourself on social media. If you ever identify yourself as an employee of this company, you should make it clear that posted opinions and content are your own, and not attributed to Alta.
- Make sure anything you post is consistent with our Guiding Principles.
- Alta Resources corporate social media team monitors online conversations about our brands and engages daily with stakeholders, including members, community partners and more. Remember, as stated above, only employees authorized to do so may speak on behalf of Alta. Never post confidential or proprietary information of Alta Resources, our clients or their customers.
- No photos, videos or images of Alta production areas are allowed due to confidential information we process on a routine basis. Do not upload pictures and videos of Alta offices and employees to social media sites that might compromise their security. Do not disclose confidential or proprietary information.

If you make a mistake on social media, don't cover it up. Admit the mistake and try to correct it. You can also ask for help from a supervisor or other appropriate resource.



RELATIONSHIPS:

**OUR COMMITMENT TO STRONG
LASTING RELATIONSHIPS**

6

RELATIONSHIPS: OUR COMMITMENT TO STRONG LASTING RELATIONSHIPS

Interactions with Clients, Vendors and 3rd-Parties

When interacting with clients, vendors or other 3rd-party organizations, always be objective and honorable.

When making purchasing decisions, it is your responsibility to adhere to the following guidelines:

- Be fair and ethical
- When purchasing products or services for the company, put Alta's interests first and seek to obtain the maximum value for the money spent consistent with our policies
- Observe prudent and frequent competitive bidding processes
- Treat all vendors fairly, honestly and courteously
- Avoid unfair buying tactics and favoritism
- Never take unfair advantage of any vendor through manipulation, concealment, misrepresentation of material facts or any other unfair practice

Alta is committed to having our suppliers reflect the same diversity we seek in our workforce. When possible, work to identify minority and women-owned business enterprises, and evaluate them in accordance with their qualifications.

Other best practices to follow when dealing with clients, vendors or 3rd-party organizations include:

- Be aware of your obligations as they relate to customers
- Treat others as you wish to be treated
- Understand the policies and standards applicable to our company
- Don't misrepresent the characteristics or capabilities of our services or our client's

Be careful when collecting information about competitors, customers and vendors. You have a responsibility to comply with Alta's policies in gathering competitive information in the marketplace. Although the standard for what is and isn't acceptable may vary from country to country, Alta prohibits certain practices that are always improper, including:

- Theft
- Blackmail
- Wiretapping
- Bribery
- Trespassing
- Industrial espionage
- Receipt of stolen property
- Asking or inducing someone to disclose information that is confidential regarding a current or former employer

In addition, collecting information by misrepresenting facts, employee identity or company affiliation is also prohibited. If you find you're in possession of information that may have been obtained unethically or illegally, or if you're ever in doubt about whether a particular practice for the collection of information is proper, contact Alta's Human Resources or Legal Compliance department.





Entertainment, Gifts and Gratuities

The exchange of gifts is often a common business practice. It can help build goodwill among companies with which we do business. However, when gift giving becomes lavish or frequent, it can suggest something improper. Alta's gift-giving policies are in place to help you determine what's appropriate and what is not.

Our policies are designed to:

- Comply with the law and, when giving a gift, comply with the company policies of the person receiving the gift
- Make sure our success is based on the merits of our services, not gifts we give or receive
- Promote transparency, as we don't engage in activities that would compromise our professional judgment or suggest favorable or preferential treatment

What is a "Gift?"

A gift is anything of value. It includes tangible items such as jewelry and art, but also intangible items like discounts, services, loans, favors, special privileges, advantages, benefits and rights not available to the general public. A "gift" also includes meals, entertainment, hospitality, vacation trips, use of vacation homes, tickets to sporting or music events, golf outings, vendor familiarization trips and use of recreational facilities. Under no circumstances should you ever solicit a gift from any person or company that is doing, or seeks to do, business with us. The only exception is if the gift is for charitable purposes and no employee receives any benefit.

Note: Meals, entertainment and hospitality may also qualify as a gift.

Giving gifts:

Offering gifts to win or keep business is unethical and, in many cases, illegal. Be sure you understand the rules and ask questions if you're unsure about whether or not a particular gift is okay. In general, you should never give a gift that:

- Is (or could reasonably be perceived to be) an inducement to do business with our company
- Would be considered excessive under the circumstances
- Would violate our company policies or those of the recipient
- Would be contrary to the interests of Alta Resources
- Is, in fact, different from what you reported either to us or to others

In addition, working with governmental clients and officials poses even greater scrutiny in regard to entertainment and gift giving. Under no circumstances should you enter into any such transaction with a governmental client or official unless you first consult with Alta's Legal Compliance team.



This is a general framework for decision-making. Keep in mind, we never accept any gift if it would compromise our professional judgment or suggest favorable or preferential treatment.

Contact the Legal Compliance team with any questions or concerns regarding Alta's gift policy.



Fair Competition

Alta Resources respects and complies with competition laws in the locations where we conduct business. Anti-trust and competition laws are designed to promote a free marketplace. Failure to comply with these laws can have serious and far-reaching consequences for the individuals involved and for Alta. Remember, a formal, written agreement is not required to violate the law and the mere exchange of information can be a violation.

We expect our employees to compete aggressively, but fairly, and to sell our services based on their quality and merit. Failing to do so can lead substantial criminal fines and civil financial liability for both you and Alta, as well as imprisonment for you.

Antitrust laws (sometimes called “competition laws” or “unfair trade laws”) prohibit agreements that unreasonably restrict competition. Don’t enter into any agreement or understanding, whether formal or informal, with a competitor, customer or supplier to:

- Set prices or price-related terms (also known as “fixing” prices)
- Refuse to deal with a customer or supplier
- Divide territories or customers

Keep in mind, antitrust laws are complex and differ from country to country. Entering into exclusive dealing or licensing agreements, engaging in pricing practices that suggest a monopoly, charging different prices to different customers for the same service and other similar practices, may raise issues under antitrust laws. If you ever have a question about how antitrust and competition laws apply to a particular business situation, you should seek help from Alta’s Legal Compliance team.

Anti-Bribery/Anti-Corruption Laws

We believe customers should choose our services because of their intrinsic value, not because they received something extra from us. You must never offer anything of value to obtain an improper advantage when conducting Alta business. We prohibit kickbacks, bribes and payoffs. This includes the giving or accepting of money, fees, gifts, favors, or anything of value provided directly or indirectly in return for more favorable treatment.

It is just as wrong to offer a kickback as it is to accept a bribe. Never accept anything from a vendor or supplier in exchange for favorably considering their product. Remember, your good judgment is not for sale.

All countries prohibit bribery of their public officials. Generally, these laws prohibit giving anything of value to government officials or their family members for the purpose of obtaining or retaining business. Alta extends its philosophy beyond these laws to include employees or private parties engaged in a commercial transaction as well.





We comply with the laws and regulations governing the services we provide to our clients. We support many heavily regulated industry sectors, including those governed by the FDA, Health and Human Services, Affordable Care Act, TCPA and many more. Alta Resources' employees are to be respectful when working with government officials. Cooperation with reasonable requests for information from government and regulatory agencies is expected.

When working with government and regulatory officials, remember:

- Always show respect
- Forward any non-routine verbal or written requests for information to Alta's Legal Compliance team
- Work with the Legal Compliance and/or Finance departments on information requests, and treat any such requests for information from the government as one of your highest priorities
- Respond to requests for information within the requested timeframe, and ensure the information you provide is truthful and accurate
- Never impede, obstruct, improperly influence the conclusions of, or affect the integrity or availability of any government review or investigation
- If you have any doubt about how to respond, or about the accuracy of the information you are providing, consult your supervisor before responding
- If the government or regulatory agency has a vendor working on their behalf, deal with that vendor as if it were the agency itself

Providing accurate, complete information is critical when working with government agencies.

Remember:

- If you are approached by a person identifying himself or herself as a government investigator, contact Alta's Legal Compliance team before responding or providing any information. A representative will assist you in following proper procedures for cooperating with the investigation.
- Don't feel pressured to talk to a government investigator without first contacting our Legal Compliance team. They will consult with any employee contacted in connection with a government investigation of the company. You can advise the investigator you need to contact the Legal Compliance department for further direction and you may ask for contact information for that investigator. Please advise the investigator someone from Alta will get back to him or her as soon as possible.
- Ensure information we provide is not misleading by including all material facts. If you have any doubt about the accuracy, responsiveness or propriety of the information you may be producing, check with your supervisor. If the Legal department is engaged on the matter, do not produce any information without their approval.
- Never lie or make false or misleading statements, whether oral or written, to a government official or agency or anyone acting on their behalf, such as a lawyer or investigator.
- Never attempt to persuade or assist a company employee or any other person, to provide false or misleading information to a government official or agency.
- Never destroy or alter any Alta Resources document or record when anticipating or following a government or court request for the document or record.
- Honor all holds placed on our normal document destruction procedures when a government audit or investigation is imminent or pending. Maintain this hold until you are instructed in writing by the Legal Compliance team that it can be released.



RESULTS:
COMMITTED WITH A SENSE OF PASSION,
FOCUS AND URGENCY

Where to go with Concerns

The Chief Compliance Officer is responsible for administering Alta's Compliance & Ethics Program. To contact the Chief Compliance Officer, you can utilize any of the avenues below:

- Contact a staff member of the Compliance & Ethics Office at CorporateCompliance@AltaResources.com
- Call Alta's Chief Compliance Officer directly at 920.722.7207
- Contact the Ethics Hotline at:
 - o Phone: U.S. 855.845.3450
 - o Online: AltaResources.EthicsPoint.com



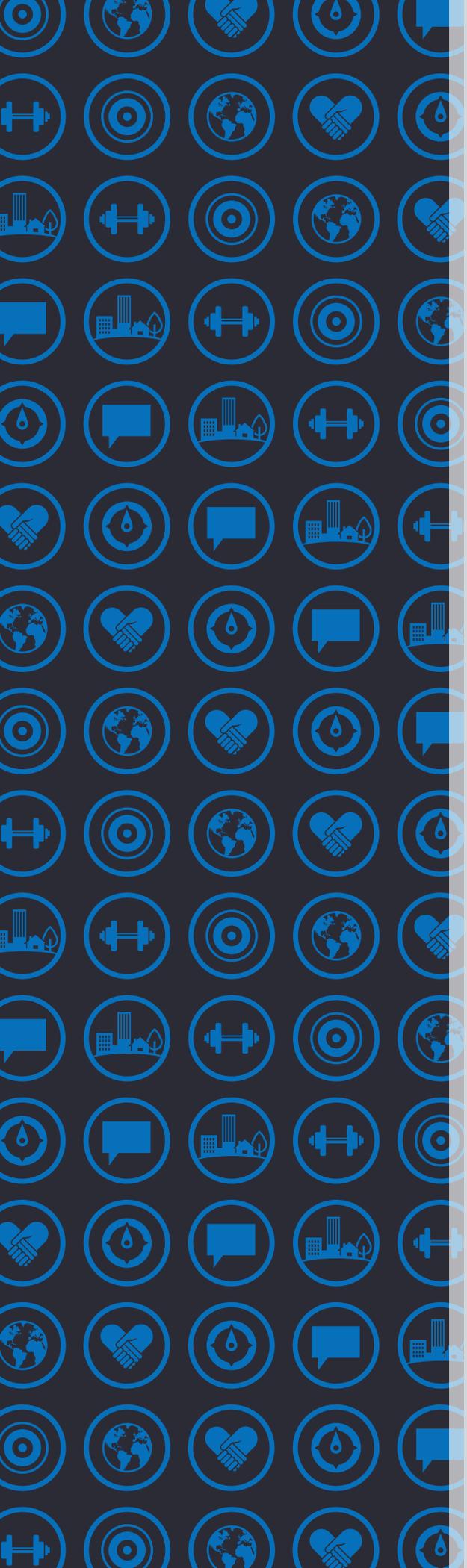
Our Code of Business Conduct & Ethics

This Code is a common-sense guide to help you make good business decisions.

It applies to everyone at Alta Resources, including senior leadership. Each of us is expected to read, understand and follow our Code. It will help you:

- Resolve difficult questions about conduct on the job
- Apply the policies and laws that control and guide our business
- Work with your fellow employees, customers, business partners, competitors, regulators, vendors and suppliers
- Identify and report suspected illegal or unethical behavior





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