



CODE OF BUSINESS ETHICS AND CONDUCT

Twenty Bridge Staffing

February 2018

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Twenty Bridge Staffing

The success of Twenty Bridge Staffing (Twenty Bridge) is dependent on the trust and confidence we earn from our employees and Clients. We gain credibility by adhering to our commitments, displaying honesty and integrity and reaching company goals solely through honorable conduct. It is easy to *say* what we must do, but the proof is in our *actions*.

Twenty Bridge Staffing's Code of Business Ethics & Conduct (Code of Conduct) covers many areas and sets forth standards and behaviors by which we conduct business. It applies to all Twenty Bridge Staffing employees, setting a clear expectation that the standards be followed always in job-related activities. The Code of Conduct is not a substitute for good judgment nor will it cover every situation a Twenty Bridge Staffing employee may encounter. More detailed information regarding Twenty Bridge Staffing's Code of Conduct are outlined below. If an employee has any questions about this Code of Conduct, contact HR@twentybridge.com for additional details.

Unacceptable workplace behavior is inconsistent with the behavior described in the Code of Conduct. Behavior, which would be considered unacceptable at Twenty Bridge Staffing, includes, but is not limited to, the following:

- Stealing and misuse of time and resources – includes not only misusing physical company assets but “stealing time” from Twenty Bridge Staffing such as aimless internet surfing, extending breaks beyond the allotted time, engaging in lengthy gossip sessions during working time, falsifying timesheets, and coming to work late or leaving early
- Bullying – progressive and systematic negative antisocial behavior, which includes verbal and physical abuse, consistent attempt to belittle others, lack of respect for authority, social exclusion and spreading of rumors
- Denouncing company policies – includes badmouthing Twenty Bridge Staffing or Clients' policies to coworkers, clients and the public verbally or through other means such as social networking sites
- Social loafing – includes reducing one's individual efforts and work outputs when working in teams
- Inappropriate verbal and physical actions – such as using profanity, making insulting comments, yelling, teasing, name calling or ridicule or making someone the brunt of pranks or practical jokes, making offensive gestures, and viewing inappropriate images or pornography in hard copy or electronically
- Dressing inappropriately
- Undermining the performance, reputation or professionalism of others – by deliberately withholding information, resources or authorization or supplying incorrect information

Absenteeism and Tardiness

Absences and and/or tardiness are disruptive, expensive, and can place an unfair burden on Twenty Bridge Staffing and its Clients. To that end, employees are expected to report to work on time and on a regular basis. If an employee knows he/she will be unable to work for all or a part of their scheduled shift, the employee must notify Twenty Bridge Staffing's staffing manager and the Client in writing as soon as possible by email but not later than two hours before his/her scheduled shift is to start. An absent employee must notify Twenty Bridge Staffing's manager and the Client each day of the absence indicating his/her availability to return to work.

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Proprietary and Confidential Information

Twenty Bridge Staffing property and Client property includes not only tangible property such as desks and computers, but also intangible property such as information. Of particular importance are proprietary information and confidential information.

“Proprietary Information” includes all information relating in any manner to the business of Twenty Bridge Staffing and its affiliates, clients, consultants, and business associates, which is obtained by Twenty Bridge Staffing employees during the course of their work. This handbook, for example, contains proprietary information.

“Confidential Information” includes any Twenty Bridge Staffing or Client information, which is unknown generally to the public or to the industry. This includes, but is not limited to the following:

- Computer programs, including source code and flow charts;
- Names, buying habits, and practices of Twenty Bridge Staffing’s Clients, vendors and/or suppliers;
- Customer lists, customer files, personnel files, computer records, financial and marketing data, formulas, and trade secrets;
- Training methods, marketing strategies, sales techniques, new products or new uses for old products, contracts, licenses, and business systems;
- Financial information including costs of materials, the prices for which Twenty Bridge Staffing buys or sells its products or services, compensation paid to employees and other terms of employment;
- Scientific studies or analyses; or
- Confidential information of, about, or concerning the business of Twenty Bridge Staffing or any Client, and their manner of operation.

Protecting proprietary information and confidential information is of vital concern to Twenty Bridge Staffing. Employees may not disclose or use proprietary information or confidential information except as their jobs require. This obligation remains even after an employee’s employment relationship with Twenty Bridge Staffing ends. Anyone who violates this guideline will be subject to discipline and possible legal recourse.

Security

To avoid loss of Twenty Bridge Staffing property, each Twenty Bridge Staffing office maintains rules and procedures for maintaining control of entrances, exits, restricted areas, document control, and recordkeeping. Employees are to abide by these rules and procedures and must observe good security practices.

Employees are responsible for keeping proprietary information and confidential information secure from outside visitors and all other persons who do not have a legitimate reason to see or use such information.

Failure to adhere to Twenty Bridge Staffing policies regarding proprietary information and confidential information constitute grounds for discipline, up to and including dismissal.

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Human Trafficking

Twenty Bridge Staffing's Code of Conduct establishes respect for others as a fundamental Twenty Bridge Staffing principle, and one that Twenty Bridge Staffing employees are expected to honor. To that end, Twenty Bridge Staffing and its employees shall not, while in the performance of government contracts,

- Engage in trafficking in persons;
- Procure commercial sex acts; or
- Use forced labor in the performance of government contracts.

Failure to adhere to this policy regarding human trafficking constitutes grounds for discipline, up to and including dismissal.

Obligations on Reassignment or Termination

Prior to reassignment or termination (voluntary or involuntary), employees return all Twenty Bridge Staffing and Client documents, computer records, and other tangible Twenty Bridge Staffing and Client property in their possession or control before a new assignment can be issued.

CONFLICTS OF INTEREST

Employees are expected to use good judgment, to adhere to high ethical standards, and to avoid situations that create an actual or potential conflict between the employee's personal interests and the interests of Twenty Bridge Staffing or Client. A conflict of interest exists when the employee's loyalties or actions are divided between Twenty Bridge Staffing's or Client's interests and those of another, such as a competitor, supplier, or customer. Both the fact and the appearance of a conflict of interest should be avoided. Employees unsure as to whether a certain transaction, activity, or relationship constitutes a conflict of interest are encouraged to discuss it with either their Twenty Bridge manager or Twenty Bridge's HR department at HR@twentybridge.com.

Non-disclosure of actual or potential conflict or apparent conflict of interest may result in termination of a contract, suspension or debarment from contracting with the federal government, and/or imprisonment and fines. Any outside activities related to these conditions should be fully disclosed before the activity is undertaken. If known by the employee, the same information must be disclosed for immediate family members or relatives. Disclosure is required for the following:

- Investing in any supplier, customer or competitor under the following conditions:
 - Financial interest in any supplier, customer or competitor where the Twenty Bridge Staffing employee has influence on contracts, processes, products of the supplier or Twenty Bridge Staffing business decisions with respect to that entity.
 - Financial interest in any supplier, customer or competitor if the holding is either five percent (5%) or more of the stock, assets or other interests of the supplier, customer or competitor; or ten percent (10%) or more of the employee's net assets. (This does not pertain to the administration of Twenty Bridge Staffing's 401K plan.)
- Acting as an employee, officer, director, partner, consultant, representative, agent, auditor or advisor, of any of the following:
 - A supplier, customer, partner, subcontractor, or competitor of Twenty Bridge Staffing or Client.
 - Any business that is involved in technical areas or product lines that are similar to those of

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- Any business whose customers include Twenty Bridge Staffing, its Clients, its customers, or its suppliers.
- Acting as a consultant, advisor, or expert witness in a legal process, such as a lawsuit, administrative proceeding, mediation, arbitration, dispute resolution, government or private investigation, rule-making procedure, or similar process except for participating in a background check for a security clearance for a current or former employee(s).
- Engaging in any activity that could create the appearance of a conflict of interest, and thereby impair the reputation of Twenty Bridge Staffing for impartiality and fair dealing. Examples of such activities include:
 - Having any financial involvement with an employee or representative of a supplier, vendor, customer, partner, subcontractor, or competitor of Twenty Bridge Staffing with whom the employee regularly comes in contact while performing company business.
 - Participating in any activity that might lead to or give the appearance of unapproved disclosures of Twenty Bridge Staffing proprietary information or proprietary information owned by others who have entrusted such information to Twenty Bridge Staffing.
 - Dealing directly, in the course of normal company responsibilities, with a spouse or immediate family member or relative who is employed by a supplier, vendor, customer, or competitor of Twenty Bridge Staffing.
 - Operating as a supplier to Twenty Bridge Staffing.

A full description of the actual or potential conflict or apparent conflict of interest should be provided by the Twenty Bridge Staffing employee and should include the following:

- Type of actual or potential conflict or apparent conflict of interest.
- A description of the employee's Twenty Bridge Staffing duties and responsibilities and how they might relate to the outside activity.
- A general description of the current or proposed outside company or business, including the company name, product lines, and market.
- A description of the relationship of the outside company or business to Twenty Bridge Staffing, if any (for example, supplier, customer, similar products or customers, competitor).
- The position to be held by the employee or their immediate family member or relative (e.g., owner, co-owner, employee, representative, consultant, etc.) and their intended level of effort.

Based on contract requirements, Twenty Bridge Staffing employees may be required to fully disclose any actual or potential conflict or apparent conflict of interest through the Conflict of Interest Disclosure Form.

Conflicts of Interest and Government Contracts

General Responsibilities

- All employees are expected to understand and adhere to the highest standards of ethical business conduct and to understand and comply with the rules established by our customers for procuring products and services. Twenty Bridge Staffing employees may not engage in inappropriate conduct that is outlined in this policy through associate contractors, suppliers, consultants, or any other means. Employees may not ask or permit others to do anything that

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they are not permitted to do themselves.

- Employees who deal with the U.S. Government must understand the rules the U.S. Government has established for its own representatives. Employees must not attempt to induce U.S. Government personnel to do anything they are prohibited from doing or to engage in any activity that could create a perception of improper business conduct.
- Employees must not offer gifts, favors or services to any U.S. Government customer or potential customer.
- Employees must deal with U.S. Government representatives in an atmosphere of openness. Whenever possible, meetings should be scheduled in normal business locations and at normal business hours under circumstances that could not be interpreted to imply concealment.
- Any document prepared by or on behalf of Twenty Bridge Staffing and provided to U.S. Government representatives should clearly indicate that it was prepared by Twenty Bridge Staffing and include an appropriate legend if the document contains Twenty Bridge Staffing proprietary information, whether technical or financial in nature. Under no circumstances should such a document purport to be an internal U.S. Government document or the work product of someone else.
- Exchange of information between the U.S. Government and Twenty Bridge Staffing and between Twenty Bridge Staffing and another company may be appropriate if receipt or exchange of such information does not violate laws, regulations, agreements or Twenty Bridge Staffing policies and procedures. Unauthorized possession or use by Twenty Bridge Staffing of U.S. Government or competitor data or information may be construed as giving Twenty Bridge Staffing an unfair competitive advantage and could be the basis for a bid protest, debarment, or civil or criminal charges against Twenty Bridge Staffing and the individual employees involved. Accordingly, information may properly be received (whether orally, in writing, or electronically) only from authorized sources and under circumstances in which there is no doubt as to the company's or the employee's right to receive and possess such information. If there is any doubt, an employee's immediate manager or the president of Twenty Bridge Staffing should be contacted before proceeding.
- Information that is proprietary to Twenty Bridge Staffing should not be provided to another company, and another company's proprietary information should not be sought or accepted by Twenty Bridge Staffing, unless the parties have entered into an appropriate Non-Disclosure Agreement addressing the use and protection of the proprietary information.
- Twenty Bridge Staffing encourages a full and open dialogue with U.S. Government customers subject to the awareness that particular care should be taken to avoid even the appearance of a conflict of interest or other impropriety, particularly as procurement activity approaches the competition stage. Conflicts occur when the degree of access to U.S. Government information or participation in the development of a requirement reaches a level that places a contractor at an unfair competitive advantage in bidding a procurement opportunity. Such conflicts could result in bid disqualifications and possible civil or criminal action against the company and/or involved employees.
- In addition to compliance with laws and regulations, employees will conduct themselves in such a way that the company's integrity is not questioned. The appearance of impropriety must be avoided, and care must be taken to ensure that actions that may otherwise be proper do not lead to misunderstandings detrimental to the company's reputation and chances of winning a procurement opportunity.

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Marketing the U.S. Government

Private industry is an important source of information to the U.S. Government on future products that could satisfy U.S. Government needs. Exchange of information about those needs and the means of satisfying them are therefore in the national interest. Twenty Bridge Staffing employees may participate in this process and, if pursued in accordance with authorized procedures, promote solutions based on Twenty Bridge Staffing product lines and skills.

- The following marketing activities are acceptable:
 - Inquiring through authorized channels about U.S. Government requirements.
 - Recommending ways of satisfying U.S. Government requirements based on Twenty Bridge Staffing products and capabilities.
 - Commenting factually about solutions advanced by others if properly requested by U.S. Government personnel.
- The following marketing activities are unacceptable:
 - Requesting or receiving information from U.S. Government personnel that they are prohibited from providing by virtue of law or their own regulations.
 - Offering business courtesies.
 - Engaging in marketing activities that could be perceived by others as improper business conduct.
 - Seeking, obtaining, or using U.S. Government or competitor information or documents that Twenty Bridge Staffing is not authorized to possess, or obtaining U.S. Government or competitor information or documents other than through authorized channels and with appropriate documentation.

Activities after a Contract Has Been Awarded

Derogatory comments about contract awards to competitors should not be made. Propriety and impartiality in U.S. Government source selection should be assumed. If any employee has reason to believe that a conflict of interest or other improper activity may have affected the outcome of a source selection, or that material facts may not have been considered, the matter should be reported to HR@twentybridge.com.

Activities during Contract Performance

It is essential that Twenty Bridge Staffing preserve its reputation for honoring contractual commitments. It is expected that all employees who are responsible for contract performance will conduct themselves accordingly. Legitimate differences of opinion may arise about contractual terms and performance. If this happens, Twenty Bridge Staffing employees should contact HR@twentybridge.com.

EQUAL EMPLOYMENT OPPORTUNITY

Twenty Bridge Staffing provides equal opportunity for all applicants and employees. Twenty Bridge Staffing does not unlawfully discriminate on the basis of race, color, religion, sex (including pregnancy, childbirth and related conditions), gender identity, gender expression, age, national origin, ancestry, or physical or mental disability, legally protected medical condition or information, genetic information, family care status, veteran status, domestic partner status, sexual orientation, or any other basis protected by local, state, or federal laws. When necessary, Twenty

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Bridge Staffing makes reasonable accommodations for disabled employees and for pregnant employees who request an accommodation, with the advice of their health care providers, for pregnancy, childbirth, or related medical conditions. This policy also applies to disabled veterans and veterans of the Vietnam era. In addition, all other personnel matters, such as compensation, benefits, layoffs, training, and education shall be administered without unlawful discrimination of any kind.

Twenty Bridge Staffing understands and reviews its Affirmative Action Compliance Program (AACP) annually and is committed to making good faith efforts towards achieving the objectives of the AACP.

All employment decisions are based on objective standards and the furtherance of equal employment opportunity. Employees are encouraged to discuss any questions or concerns about equal employment opportunities with either Twenty Bridge's manager or HR@twentybridge.com.

AGE DISCRIMINATION

It is the policy of Twenty Bridge Staffing to comply with the Age Discrimination Act of 1967 (ADEA), which prohibits an employer from discriminating in employment, based on age, against persons 40 or older.

HARASSMENT PREVENTION

Twenty Bridge Staffing affirms its commitment to ensuring an environment for all employees, which is fair, humane, and respectful. It is Twenty Bridge Staffing's policy to comply with Title VII of the Civil Rights Act of 1964 and the EEOC Guidelines of 1980 and applicable state laws, which state that harassment is an unlawful practice. It is also Twenty Bridge's policy to provide harassment prevention training every two years, which meets applicable legal requirements mandated by local and federal laws.

Twenty Bridge Staffing does not tolerate discrimination or harassment based on gender sex (including pregnancy, childbirth or related medical conditions), gender identity, gender expression, race, color, religion, national origin, ancestry, age, physical disability, mental disability, legally protected medical condition or information, genetic information, family care status, marital status, domestic partner status, sexual orientation, veteran status, military caregiver status, or any other status protected by state and federal laws.

Harassment

Twenty Bridge Staffing is committed to providing a workplace free of unlawful harassment. This includes sexual harassment (which includes harassment based on gender, gender identity, pregnancy, childbirth, or related medical conditions), as well as harassment based on such factors as race, color, creed, religion, national origin, citizenship, ancestry, age, physical disability, mental disability, medical condition, marital status, sexual orientation, domestic partner status, family care or medical leave statutes, veteran status, or any other basis protected by federal, state, or local laws.

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It is illegal and against the policies of Twenty Bridge Staffing for any employee, male or female, to unlawfully harass another employee, client, or vendor on any of the bases listed above. Twenty Bridge Staffing strongly disapproves of and will not tolerate harassment of employees by managers, supervisors, or co-workers. Similarly, Twenty Bridge Staffing will not tolerate harassment by its employees of non-employees with whom Twenty Bridge Staffing employees have a business, service, or professional relationship. Twenty Bridge will also attempt to protect employees from harassment by non-employees in the workplace.

Harassment includes verbal, physical, and visual conduct that creates an intimidating, offensive, or hostile working environment or that interferes with an employee's work performance. Such conduct constitutes harassment when (1) submission to the conduct is made either an explicit or implicit condition of employment; (2) submission or rejection of the conduct is used as the basis for an employment decision; or (3) the harassment interferes with an employee's work performance or creates an intimidating, hostile, or offensive work environment.

Harassing conduct can take many forms, and may include, but is not limited to, the following (when based on an employee's protected status as noted above): derogatory comments, slurs, jokes, nicknames, assault, impeding or blocking another's movement or otherwise physically interfering with normal work, pictures, drawings, or cartoons, violating someone's "personal space," foul or obscene language, leering, stalking, staring, unwanted or offensive letters or poems, offensive email or voicemail messages, or non-verbal innuendo that relates to or reflects negatively upon any protected group.

Sexual Harassment

It is illegal and against the policies of Twenty Bridge Staffing for any employee, male or female, to sexually harass another employee by:

- Making unwelcome sexual advances or requests for sexual favors a condition for an employee's continued employment;
- Any verbal or physical conduct of a sexual nature;
- Making submission to or rejections of such conduct as the basis for employment decisions affecting the employee; or
- Creating an intimidating, hostile, or offensive working environment by such conduct.

Sexually harassing conduct can be by a person of either the same or opposite sex.

Twenty Bridge Staffing understands that victims of harassment are often embarrassed and reluctant to report acts of harassment for fear of being blamed, concern about being retaliated against, or because it is difficult to discuss sexual matters openly with others. However, no employee should have to endure harassing conduct, and Twenty Bridge Staffing therefore encourages employees to promptly report any incidents of harassment so that corrective action may be taken.

Any employee who believes that the actions or words of a manager, fellow employee, client, or vendor, constitute any form of unlawful harassment has a responsibility to report the situation immediately to Twenty Bridge's manager or the Human Resources office at (805) 484-1909 ext. 3205, or to HR@twentybridge.com so that an investigation may be initiated.

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Every reported complaint of harassment will be investigated thoroughly and promptly. The Human Resources representative or manager responsible for the investigation will notify the employee who lodged the harassment complaint of the results of the investigation. The investigation will be handled in as confidential a manner as possible consistent with a full, fair, and proper investigation.

To the extent possible, Twenty Bridge Staffing will maintain the confidentiality of the reporting employee and of the investigation. Twenty Bridge Staffing will disclose information only to those who need such information to conduct an investigation and/or take corrective action.

Twenty Bridge Staffing will not tolerate retaliation against any employee who makes a good faith complaint of workplace harassment or for cooperating in an investigation.

Any manager who receives a report of harassment must immediately contact Twenty Bridge Staffing's Human Resources office at (805) 484-1909 ext. 3205, or to HR@twentybridge.com so that an investigation may be initiated. All reports of harassment will be taken seriously and an investigation will be conducted to determine what steps are necessary. If Twenty Bridge Staffing determines that unlawful harassment or retaliation has occurred, Twenty Bridge Staffing will take appropriate corrective action and will impose discipline on offending employees. The appropriate corrective action/discipline will depend on the particular facts but may include training, referral to counseling, written or oral warnings, probation, and/or reassignment of responsibilities, suspension, or termination. If the harassing behavior is that of a non-employee, Twenty Bridge Staffing will take appropriate corrective action in an attempt to ensure that such behavior is not repeated.

Anti-Harassment Training

Every Twenty Bridge Staffing employee is required to undergo harassment prevention training once every two years, which meets applicable legal requirements mandated by local and federal laws. An employee who fails to comply with this section may be subject to disciplinary action, up to and including termination of employment.

DRUG-FREE WORKPLACE GUIDELINE

It is the intent of Twenty Bridge Staffing to maintain a workplace that is free of drugs and alcohol and to discourage drug and alcohol abuse by Twenty Bridge Staffing employees. Twenty Bridge Staffing has a vital interest in maintaining safe and efficient working conditions for Twenty Bridge Staffing employees.

Twenty Bridge Staffing has established this Guideline concerning the use of alcohol and drugs to further its interest in avoiding accidents, to promote and maintain safe and efficient working conditions for its employees, and to protect its and its clients' business, property, and operations. Employees must abide by this Guideline as a condition of continued employment with Twenty Bridge Staffing.

All employees are required by this Guideline to notify Twenty Bridge Staffing of any conviction under a criminal drug statute for a violation occurring in the workplace or during any Twenty

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Bridge Staffing-related activity or event not later than five days after an employee's conviction. When required by federal law, Twenty Bridge Staffing will notify any federal agency with which it has a contract, of any employee convicted under a criminal drug statute for a violation occurring in the workplace.

Definitions

For purposes of this Guideline:

- “Illegal drugs or other controlled substances” means any drug or substance that:
 - Is not legally obtainable; or
 - Is legally obtainable but has not been legally obtained; or
 - Has been legally obtained but is being sold or distributed unlawfully.
- “Legal drugs” means any drug, including prescription drugs and over-the-counter drugs, that has been legally obtained and that is not unlawfully sold or distributed.
- “Abuse of any legal drug” means the use of any legal drug:
 - For any purpose other than the purpose for which it was prescribed or manufactured; or
 - In a quantity, frequency, or manner that is contrary to the instructions or recommendations of the prescribing physician or manufacturer.
- “Reasonable suspicion” includes a suspicion that is based on specific personal observations such as an employee's manner, disposition, muscular movement, appearance, behavior, speech or breath odor; information provided to management by an employee, by law enforcement officials, by a security service, or by other persons believed to be reliable; or a suspicion that is based on other surrounding circumstances.
- “Possession” means that an employee has the substance on his or her person or otherwise under his or her control.
- “Controlled Substance” means any substance listed in Schedules I-V of Section 202 of the Controlled Substance Act, 2 U.S.C. § 812, as further defined in the corresponding regulations at 21 C.F.R. §§ 1308.11-1308.15.
- “Conviction” means finding guilt, including a plea of “nolo contendere” (no contest), or imposition of sentence, or both, by any judicial body charged with the responsibility to determine violations of the federal or state criminal drug statutes.
- “Criminal Drug Statute” means a federal or non-federal criminal statute involving the manufacture, distribution, dispensing, possession, or use of any controlled substance.
- “Workplace” means Twenty Bridge Staffing premises and any other location where Twenty Bridge Staffing employees perform their jobs.
- “Under the influence” is defined as being unable to perform work safely and productively and being in a physical or mental condition that risks the safety and well-being of the individual, other employees, the public, or company property.

Prohibited Conduct

The prohibitions of this section apply wherever the interests of Twenty Bridge Staffing may be adversely affected, including any time an employee is:

- On Twenty Bridge Staffing or Twenty Bridge Staffing's Client premises;
- Conducting or performing Twenty Bridge Staffing business, regardless of location;
- Operating or responsible for the operation, custody, or care of Twenty Bridge Staffing or client

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- equipment or other property; or
- Responsible for the safety of others.

Prohibitions Include:

Alcohol and recreational marijuana

The following acts are prohibited and subject an employee to discharge:

- Unauthorized use, possession, purchase, sale, manufacture, distribution, transportation, or dispensation of alcohol or recreational marijuana; or
- Being under the influence of alcohol and/or recreational marijuana.

Illegal Drugs

The following acts are prohibited and subject an employee to discharge:

- Use, possession, purchase, sale, manufacture, distribution, transportation, or dispensation of any illegal drug or other controlled substance; or
- Being under the influence of any illegal drug or other controlled substance.

Legal Drugs

The following acts are prohibited and subject an employee to discharge:

- Abuse of any legal drug including medicinal marijuana;
- Purchase, sale, manufacture, distribution, transportation, dispensation, or possession of any legal prescription drug in a manner inconsistent with law; or
- Working while *impaired* by the use of a legal drug *whenever* such impairment might:
 - Endanger an employee's safety or the safety of any other person;
 - Pose a risk of significant damage to Twenty Bridge Staffing property; or
 - Substantially interfere with job performance or the efficient operation of Twenty Bridge Staffing's business.

Disciplinary Action

A first violation of this Guideline may result in immediate discharge. A second violation of this Guideline at any time will result in an employee's immediate discharge.

An employee convicted under a criminal drug statute for a violation occurring in the workplace or during any Twenty Bridge Staffing-related activity or event will be deemed to have violated this Guideline.

Twenty Bridge Staffing, at the discretion of management, may choose not to discharge an employee for a first violation of this Guideline if the violation *did not*:

- Cause an injury to or endanger the safety of the employee or the safety of anyone else;
- Result in significant damage to Twenty Bridge Staffing or client property or pose a risk of significant damage; or
- Involve the possession of illegal drugs or other controlled substances in quantities greater than for personal use.

Such a discretionary choice by Twenty Bridge Staffing not to discharge an employee is

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conditioned on the employee satisfactorily completing an approved drug or alcohol abuse assistance or rehabilitation program when recommended by Twenty Bridge Staffing.

An employee discharged for a violation of this Guideline will not be eligible for rehire by Twenty Bridge Staffing.

Use of Legal Drugs

Impairment Due to Use of Legal Drugs

Twenty Bridge Staffing recognizes that it may be necessary for an employee to use legal drugs from time to time. Twenty Bridge Staffing also recognizes that an employee who is using legal drugs might become impaired by the drugs such that the employee's ability to perform his or her job duties or to perform them safely would be compromised. An employee may not work while the employee is impaired by the use of legal drugs if the impairment might endanger the employee or someone else, pose a risk of significant damage to Twenty Bridge Staffing property, or substantially interfere with the employee's job performance. If an employee is so impaired by the appropriate use of legal drugs, an employee may not report to work. To accommodate the absence, the employee may use accrued PTO. Nothing in this Guideline is intended to sanction the use of accrued PTO to accommodate absences due to the **abuse** of legal drugs. Further, nothing in this Guideline is intended to diminish Twenty Bridge Staffing's commitment to employ and reasonably accommodate qualified disabled individuals.

Duty to Disclose

If an employee operates or is responsible in any way for the operation, custody, or care of Twenty Bridge Staffing or client property, or for the safety of any other person, the employee has a duty to disclose the nature of his or her job duties to any prescribing physician and to inquire of such physician(s) whether use of the drugs as prescribed might result in the dangers, risks, or impairment that this Guideline is intended to prevent.

Authorized Conduct

Nothing in this Guideline is intended to prohibit the customary and ordinary use of over-the-counter drugs, so long as such activity does not violate any law or result in the employee or anyone else being under the influence of drugs in violation of this Guideline.

Unless the employee is in a designated safety-sensitive position, this Guideline is not intended to regulate the employee's conduct while off the job, so long as off-the-job use of alcohol or drugs does not result in the employee being under the influence of or otherwise impaired by the use of alcohol or drugs in violation of this Guideline.

Twenty Bridge Staffing may provide alcohol for consumption at certain events (e.g., social functions). The consumption of alcohol at these events does not violate this policy. Each employee is responsible for understanding his/her own tolerance for alcohol and taking the necessary steps to insure he/she does not engage in excessive consumption of alcohol or exhibit inappropriate behavior.

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Counseling/Employee Assistance

If an employee suspects that he/she may have an alcohol or drug problem, even in the early stages, the employee is encouraged voluntarily to seek diagnosis and to follow through with the treatment as prescribed by qualified professionals. The employee must use any accrued PTO if he/she wishes to voluntarily enter and participate in an approved alcohol or drug rehabilitation program. If the employee's accrued PTO does not cover the time he/she is in the rehabilitation program, then he/she is encouraged to contact HR@twentybridge.com, who will determine whether Twenty Bridge Staffing can accommodate him/her by providing unpaid leave for the time necessary to participate in the program. The employee should be aware, however, that participation in a rehabilitation program will not necessarily shield him/her from the imposition of disciplinary action for a violation of this Guideline, particularly if discipline is imposed for a violation occurring before the employee seeks assistance.

Disclosures any employee makes to Twenty Bridge Staffing concerning the employee's use of legal drugs or the employee's participation in any drug or alcohol counseling or rehabilitation program will be treated confidentially.

WORKPLACE VIOLENCE

Twenty Bridge Staffing recognizes that workplace violence is a concern among employers and employees across the country. Twenty Bridge Staffing and their Clients are committed to providing a safe, violence-free workplace and strictly prohibits employees, consultants, customers, visitors, or anyone else on company or client premises or engaging in company-related activities from behaving in a violent or threatening manner. As part of this policy, Twenty Bridge Staffing seeks to prevent workplace violence before it begins and reserves the right to deal with behavior that suggests a propensity toward violence even prior to any violent behavior occurring.

Workplace violence includes but is not limited to the following:

- Threats of any kind;
- Exhibiting physically aggressive or violent behavior, such as intimidation of, or attempts to, instill fear in others;
- Other behavior that suggests a propensity toward violence, which can include belligerent speech, excessive arguing or swearing, sabotage, or threats of sabotage of company or customer property, or a demonstrated pattern of refusal to follow Twenty Bridge Staffing's or Clients' policies and procedures;
- Defacing company or customer property or causing physical damage to the facilities; or
- With the exception of security personnel, bringing weapons or firearms of any kind on company or Client premises, in company or Client parking lots, at company or Client events, or while conducting company business.

If an employee observes or becomes aware of any of the above listed actions or behavior by an employee, customer, consultant, visitor, or anyone else, the employee should notify his or her Twenty Bridge Staffing manager and Client manager immediately. All reports of workplace violence will be taken seriously and will be investigated promptly and thoroughly. To the extent possible, Twenty Bridge Staffing will maintain the confidentiality of the reporting employee; and Twenty Bridge Staffing will not tolerate retaliation against any employee who reports workplace

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violence.

If Twenty Bridge Staffing determines that workplace violence has occurred, Twenty Bridge Staffing will initiate a decisive and appropriate response. The response may include, but is not limited to:

- Disciplinary action;
- Suspension or termination of employment;
- Suspension or termination of any business relationship;
- Civil and/or criminal prosecution of all persons involved.

TECHNOLOGY USE AND PRIVACY

Technology Resources Definition

“Technology Resources” consist of all electronic devices, software, and means of electronic communication including, but not limited to, the following: personal computers and workstations; lap-top computers, smartphones, personal digital assistants, mini and mainframe computers, computer hardware such as disk drives and tape drives, peripheral equipment such as printers, modems, fax machines, and copiers, computer software applications and associated files and data, including software that grants access to external services, such as the Internet, electronic mail, electronic timesheets, telephones, cellular phones, pagers, instant messaging systems, and voicemail systems.

Furnished Property

Clients may provide Technology Resources to authorized Twenty Bridge Staffing employees to assist them in performing their job duties for the Client. Employees need to adhere to Twenty Bridge Staffing’s Clients’ specific Technology Resource requirements. Each employee has a responsibility to use Twenty Bridge Staffing’s Clients’ Technology Resources in a manner that increases productivity, enhances Twenty Bridge’s and Client’s public image, and is respectful of other employees. Employees must comply with all laws, statutes, ordinances, rules, and regulations of any governmental entity having jurisdiction. Failure to follow Clients’ policies regarding its Technology Resources may lead to disciplinary measures, up to and including termination of employment. Moreover, Twenty Bridge Staffing reserves the right to advise appropriate legal authorities of any violation of law by an employee. All usage of Clients’ Technology Resources is also subject to Twenty Bridge Staffing’s Confidential Information policy.

Government Furnished Property

Government-furnished equipment may only be used in support of U.S. Government contracts. All items (excluding expendable items) purchased with task funds in support of a government contract, must be returned to the government at the end of the task.

Use of Technology Resources

Twenty Bridge Staffing and Clients’ resources are to be used by employees only for purposes of conducting Twenty Bridge Staffing’s and Clients’ business. If applicable, employees may however use Twenty Bridge Staffing’s Technology Resources for the following incidental personal uses so long as such use does not interfere with the employee’s duties, is not done for

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pecuniary gain, does not conflict with Twenty Bridge Staffing's or Client's business, and does not violate any Twenty Bridge Staffing or Client policy:

- To send and receive necessary and occasional personal communications;
- To prepare and store incidental personal data (such as personal calendars, personal address lists, and similar incidental personal data) in a reasonable manner;
- To use the telephone for brief and necessary personal calls; and
- To access the Internet for brief personal searches and inquiries during meal times or other breaks, or outside of work hours, provided that employees adhere to all other usage policies.

Twenty Bridge Staffing assumes no liability for loss, damage, destruction, alteration, disclosure, or misuse of any personal data or communications transmitted over or stored on Twenty Bridge Staffing's or Clients' Technology Resources. Twenty Bridge Staffing accepts no responsibility or liability for the loss or non-delivery of any personal electronic mail or voicemail communications or any personal data stored on any Twenty Bridge Staffing property. Twenty Bridge Staffing strongly discourages employees from storing any personal data on any of Twenty Bridge Staffing's and Client's Technology Resources.

Improper Use of Technology Resources

- **Prohibition Against Harassing, Discriminatory and Defamatory Use** - Twenty Bridge Staffing is aware that employees use electronic mail for correspondence that is less formal than written memoranda. Employees must take care, however, not to let informality degenerate into improper use. Under no circumstances may employees use Twenty Bridge Staffing's or Clients' Technology Resources to intentionally transmit, receive, or store any information that is discriminatory, harassing, defamatory, indecent, threatening, or that otherwise could adversely affect any individual, group or entity in any way (e.g., sexually explicit or racial messages, jokes, cartoons, etc.).
- **Prohibition Against Violating Copyright Laws** - Employees must not use Twenty Bridge Staffing's or Clients' Technology Resources to copy, retrieve, forward or send copyrighted materials unless the employee has the author's permission or is accessing a single copy only for the employee's reference.
- Under no circumstances are employees permitted to use Twenty Bridge Staffing's or Clients' Technology Resources to intentionally access, download, or contribute to the following:
 - gross, indecent, or sexually-oriented materials; or
 - gambling sites; or
 - illegal drug-oriented sites.
- Employees may not use any of Twenty Bridge Staffing's or Clients' Technology Resources for any illegal purpose, violation of any Twenty Bridge Staffing policy or Clients' policies, in a manner contrary to the best interests of Twenty Bridge Staffing, in any way that discloses confidential or proprietary information of Twenty Bridge Staffing, its Clients or third parties, or for personal or pecuniary gain.
- Employees should avoid sending confidential information over the Internet, except when necessary. Employees also should verify electronic mail addresses before transmitting any messages.

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Access to Technology Resources

All messages sent and received, including personal messages, and all data and information stored on Twenty Bridge Staffing's electronic-mail system, voicemail system, or computer systems are Twenty Bridge Staffing property regardless of the content. As such, Twenty Bridge Staffing reserves the right to access all of its Technology Resources at any time in its sole discretion. No employee other than the General Manger of Twenty Bridge has authority to waiver, vary or amend Twenty Bridge's right to access Technology Resources.

Although Twenty Bridge Staffing does not wish to examine personal information of its employees, on occasion, the LLC may need to access its Technology Resources including computer files, electronic-mail messages, and voicemail messages. Employees should understand, therefore, that they have no right of privacy with respect to any messages or information created or maintained on Twenty Bridge Staffing's Technology Resources, including personal information or messages. Twenty Bridge Staffing may at its discretion, inspect all files or messages on its Technology Resources at any time for any reason. Twenty Bridge Staffing may also monitor its Technology Resources at any time in order to determine compliance with its policies, for purposes of legal proceedings, to investigate misconduct, to locate information, or for any other business purpose. The best way to guarantee the privacy of personal information is not to store or transmit it on Twenty Bridge Staffing's technology resources.

In an effort to prevent unauthorized access to Twenty Bridge Staffing's proprietary information, Twenty Bridge Staffing's Technology Resources are password protected. Passwords do not confer any right of privacy upon any employee of Twenty Bridge Staffing. Thus, even though employees may maintain passwords for accessing Technology Resources, employees must not expect that any information and messages maintained on Technology Resources (including electronic mail and voicemail messages) are private. The best way for employees to ensure the privacy of personal information is to not store or transmit it on Twenty Bridge Staffing's Technology Resources. Employees are expected to maintain their passwords as confidential. Employees must not share passwords and must not access coworkers' systems without express authorization.

All employees should understand that any information kept on Twenty Bridge Staffing's or the Client's Technology Resources may be electronically recalled or recreated regardless of whether it may have been "deleted" or "erased" by an employee. Because Twenty Bridge Staffing periodically backs-up all files and messages, and because of the way in which computers reuse file storage space, files and messages may exist that are thought to have been deleted or erased. Therefore, employees who delete or erase information or messages should not assume that such information or messages are confidential or ever were confidential. If a legal dispute arises, or may arise in the future, it may be unlawful to attempt to delete or erase certain information. Employees shall fully comply with Twenty Bridge Staffing policy regarding retention or destruction of information.

So that employees understand the extent to which information is collected and stored, examples of information currently maintained by Twenty Bridge Staffing are provided below. Twenty Bridge Staffing may, however, in its sole discretion, and at any time, alter the amount and type of information it retains.

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1. Electronic Timesheets: Records are kept of all timesheet entries.
2. Electronic Mail: Electronic mail is password-protected, an authorized administrator can read electronic mail and also reset the password.
3. Desktop Facsimile Use: Copies of all facsimile transmissions are maintained in the facsimile server.
4. Document Use: Each document on Twenty Bridge Staffing computers has a history that shows which users have accessed the document for any purpose.
5. Internet Use: Internet sites visited, the number of times visited, and the total time connected to each site are recorded and periodically monitored.

The Internet and On-Line Services

Twenty Bridge Staffing and the Client may provide authorized employees access to online services such as the internet. Twenty Bridge Staffing expects that employees will use these services in a responsible way. Under no circumstances are employees permitted to use Twenty Bridge Staffing's or Clients' Technology Resources to access, download, or contribute to internet sites that contain inappropriate content such as that which is discriminatory, harassing, defamatory, obscene, indecent, threatening, or that otherwise could adversely affect any individual, group or entity.

Additionally, employees may not use Twenty Bridge Staffing's or Clients' Technology Resources to post, comment, send, or otherwise upload any information to any Web sites or other online groups, including web logs (i.e., "blogs"), social networking websites, newsgroups, discussion groups, or non-Twenty Bridge Staffing email groups, except in accordance with Twenty Bridge Staffing's Blogging Policy. Twenty Bridge Staffing strongly encourages employees who wish to access the internet for non-work-related activities to obtain their own personal internet access accounts that are unaffiliated with Twenty Bridge Staffing, and to use such accounts at home on their personal computer without making any reference to Twenty Bridge Staffing.

Twenty Bridge Staffing is very sensitive to the issue of protection of trade secrets and other confidential and proprietary information of both Twenty Bridge Staffing and third parties. "Confidential Information" includes all proprietary, confidential, and personal information covered by Twenty Bridge Staffing's guideline in this manual regarding Confidential Information. Employees are expected to use good judgment and to adhere to the highest ethical standards when using or transmitting Confidential Information on Twenty Bridge Staffing's and Clients' Technology Resources.

Confidential Information should not be accessed through Twenty Bridge Staffing's or Clients' Technology Resources in the presence of unauthorized individuals. Similarly, Confidential Information should not be left visible or unattended.

Employees should adhere to Twenty Bridge Staffing's security policy with regard to Confidential Information and take all appropriate measures to safeguard the confidentiality and security of such information. Employees should avoid sending Confidential Information via the internet, except when absolutely necessary. Employees should also verify electronic mail addresses before transmitting any messages containing Confidential Information.

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Software Use

No employee may load any software on Clients' Technology Resources (e.g. computers), by any means of transmission, unless authorized to do so by the Client. Employees need to adhere to Twenty Bridge Staffing's Clients' specific Technology Resource requirements for software use.

Security

Twenty Bridge Staffing has installed a variety of programs and devices to ensure the safety and security of Twenty Bridge Staffing's Technology Resources. Any employee found tampering or disabling any of Twenty Bridge Staffing's or Clients' security devices will be subject to disciplinary action up to and including termination. Moreover, Twenty Bridge Staffing reserves the right to advise appropriate legal authorities of any violation of law by an employee that results in the misappropriation, theft, or unlawful use of Twenty Bridge Staffing's or Clients' property or proprietary information.

To maintain the effectiveness of Twenty Bridge Staffing's security measures, employees should use only secure networks established by Twenty Bridge Staffing to access or use corporate sensitive information. Such information may not be downloaded, stored, emailed to non-Twenty Bridge Staffing equipment, or copied on any non-Twenty Bridge Staffing equipment or media (including personally owned computer, handheld devices, external memory devices, or disks) without prior written approval of the President of Twenty Bridge Staffing. If corporate sensitive information is downloaded, stored, or copied on non-Twenty Bridge Staffing equipment or media, employee must take all appropriate measures to safeguard against loss, theft, damage, or breach of such equipment or media. If corporate sensitive information is downloaded, stored, or copied on non-Twenty Bridge Staffing equipment or media, employees must permanently delete such information prior to selling or otherwise transferring out of their own possession or control such equipment or media. If corporate sensitive information is downloaded, stored, or copied on non-Twenty Bridge Staffing equipment or media and employee resigns, is terminated, or is requested to do so by management, employees must delete all corporate sensitive information they received, including any and all copies thereof. Similarly, employees may not send corporate sensitive information to their personal email accounts, even for work-related purposes, without prior written approval of the President of Twenty Bridge Staffing.

Any loss or suspected loss of corporate sensitive information, or any suspicious activity such as external hacking attempts or unusual internal activity, should be reported immediately to the President of Twenty Bridge Staffing and HR@twentybridge.com.

Only when it is mission critical *and* with the written approval of the Twenty Bridge Staffing President and Client, may an employee take a Twenty Bridge Staffing or Client electronic device (e.g., cell phone, smartphone, PDA, laptop) when traveling abroad for personal reasons.

Mobile Device Policy

Twenty Bridge Staffing prohibits the use of all handheld mobile devices including telephone, data, personal organizer, or other devices for work purposes while operating a motor vehicle or for personal purposes while operating a motor vehicle during work hours or on Twenty Bridge Staffing business. Moreover, all use of Twenty Bridge Staffing- or Client-issued mobile devices,

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or personally purchased mobile devices used for work-related purposes, must be made in accordance with Twenty Bridge Staffing policy, including the Technology Use and Privacy policy.

Employees may use hands-free mobile devices while driving when safe to do so. Special care should be taken in situations where there is heavy traffic, inclement weather, or the employee is driving in an unfamiliar area. Employees must adhere to all federal, state, and local rules and regulations regarding the use of mobile devices while driving.

Under no circumstances are employees allowed to use text devices to type or review text messages for work purposes while operating a motor vehicle or for personal purposes while operating a motor vehicle during work hours or on Twenty Bridge Staffing or Client premises.

At a minimum, any mobile devices used for accessing any Twenty Bridge Staffing or Client Technology Resources require basic security features enabled on them. This would include access to email, files or applications associated with Twenty Bridge Staffing or the Client.

Remote Access to Technology Resources

Twenty Bridge Staffing or Client, at their sole discretion, may provide certain employees with remote access systems such as a laptop to allow such employees to handle the tasks associated with their jobs while working away from the office. It is the employee's responsibility to protect and ensure the security of all Twenty Bridge Staffing- and Client-provided equipment. Employees must not share network passwords or other PINs with anyone. As soon as an employee believes Twenty Bridge Staffing-or Client-provided equipment is lost or that the security and confidentiality of the data on that equipment has been compromised, he or she must notify his or her Twenty Bridge manager and Client program manager. If Twenty Bridge Staffing-or Client-provided equipment is lost, or if it is damaged because of carelessness, employees may be responsible for replacement fees. The Twenty Bridge Staffing- or Client-provided remote access system should only be used for Twenty Bridge Staffing or Client related business. Twenty Bridge Staffing may decide that it is no longer necessary for certain employees to possess a remote access system and their ability to use such systems may be discontinued, in which case such employees are expected to return any Twenty Bridge Staffing-issued remote access systems in accordance with Twenty Bridge Staffing's "Company Property" policy.

Use of public or home networks, such as unencrypted Wi-Fi networks, can be a threat to the security and reliability of Twenty Bridge Staffing's or Client's Technology Resources.

It is the employee's responsibility to read, understand, and adhere to the specific guidance that is provided in this Technology and Privacy policy. For additional information or if there are questions regarding this policy, employees should contact HR@twentybridge.com.

Electronic Mail Guidelines

Employees are expected to use good judgment with respect to use of electronic mail ("email"). While email provides an easy manner with which to communicate, it is not appropriate to say in an email something that would never be said in person or in formal correspondence. All employees should adhere to the following with respect to use of email:

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1. *Always ask before sending an email if it is the appropriate medium of communication.* When communicating about a sensitive subject, consider whether email is the appropriate medium or whether using the phone rather than email might be more appropriate (but keep in mind that voicemail is similar to email; voicemail may be stored on a computer server and may be forwarded to third parties).
2. *Email is part of the workplace environment.* Email containing rude and insensitive comments is not only personally embarrassing, but also may serve as the basis for legal liability. Employees and managers should exercise the same care and sensitivity in communicating via email as they would when they communicate in person or in traditional forms of writing. Off-the-cuff, sarcastic, or angry comments can come back to haunt the author. Offensive email received from others should not be forwarded, and the recipient should ask the sender to refrain from sending inappropriate email.
3. *Know your audience.* When sending an email, always double-check to whom the email is addressed, especially when using the “reply to all” button. Ask whether it is appropriate for each addressee to receive the email and whether sending the email to a particular addressee will result in the unauthorized disclosure of Confidential Information. If in doubt, remove the doubted addressee.
4. *Do not use a home PC for business purposes.* Employees should understand that, if there is any concern that a court hearing a business dispute involving Twenty Bridge Staffing and a third party may require producing one’s hard drive from his or her home computer, he or she should not use a home computer for business purposes. Email relating to Twenty Bridge Staffing business, even though stored on a home computer, is recoverable and discoverable in litigation.

Audits

Twenty Bridge Staffing may perform auditing activity or monitoring to determine compliance with these policies. Audits of software and data stored on Twenty Bridge Staffing’s Technology Resources may be conducted at any time without warning.

BLOGGING POLICY

Employees may post freely and exchange opinions on interactive websites in any way that is constructive and follows all Twenty Bridge Staffing policies and codes of conduct. This policy covers employees creating, posting, commenting, or uploading to any internet websites including any Twenty Bridge Staffing sponsored site as well as any non-Twenty Bridge Staffing external site, such as media sites, chat rooms, bulletin boards, newsgroups, discussion groups, non-Twenty Bridge Staffing email groups, personal websites, video sharing sites, picture sharing sites, dating sites, and social networking sites whether or not such sites are set to private. Any inappropriate blog postings that violate these guidelines should be reported to Twenty Bridge Staffing’s manager or HR@twentybridge.com. Any questions or concerns about blogging, or this Blogging Policy should be directed to the employee’s Twenty Bridge Staffing manager or HR@twentybridge.com.

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Twenty Bridge Staffing-Sponsored Blogs

If applicable, each employee is responsible for using Twenty Bridge Staffing blogs in a way that is constructive, protects Twenty Bridge Staffing's proprietary and confidential information, and is respectful of others.

Twenty Bridge Staffing's policies regarding access to Technological Resources and monitoring of online services apply to Twenty Bridge Staffing's blogs. Twenty Bridge Staffing retains the right to delete or modify any content it deems inappropriate in its sole discretion. Furthermore, Twenty Bridge Staffing has the right to require any employee involved in posting inappropriate content to stop posting immediately. Employees who are assigned to maintain Twenty Bridge Staffing blogs are responsible for removing inappropriate content in a timely manner and reporting the inappropriate content to the Twenty Bridge Staffing president or HR@twentybridge.com.

Twenty Bridge Staffing blogs are intended for work-related issues. Each employee blogs/posts at his or her own risk and is personally and legally responsible for what he or she posts, including compliance with all applicable laws, Twenty Bridge Staffing policies, and Twenty Bridge Staffing codes of conduct.

Content posted on Twenty Bridge Staffing blogs in support of a contract must follow the processes for delivery of information and contract deliverables. It is the responsibility of the employee to understand these processes. It is the responsibility of the Twenty Bridge Staffing employee to get approval from the Twenty Bridge Staffing President prior to posting the blog. The Twenty Bridge Staffing President will review for appropriateness.

The posting of copyrighted materials on Twenty Bridge Staffing's blog must be approved by HR@twentybridge.com. Employees must respect copyright and fair use laws when posting and as a best practice, always credit and/or link to someone else's work when quoting or relying upon it.

Non-Twenty Bridge Staffing Blogs

Employees are free to create or participate in non-Twenty Bridge Staffing social media sites ("non-Twenty Bridge Staffing blogs") and other forms of online publishing and discussion that are work related. Employees blog/post at their own risk and are personally and legally responsible for their postings and comments. Twenty Bridge Staffing will not assume any liability or risk for an employee's blogging or posting online. When posting in a non-Twenty Bridge Staffing blog or online forum, if the blog in any way identifies Twenty Bridge Staffing or discusses Twenty Bridge Staffing or its business or its Clients, the employee must identify himself or herself as a Twenty Bridge Staffing employee, speak in the first person, and make it clear that what is being said is representative of the employee's personal views and opinions and does not necessarily reflect the views and opinions of Twenty Bridge Staffing or its Clients. In no way may employees represent or suggest that their opinions or positions are endorsed by Twenty Bridge Staffing or any of its managers, officers, or employees or its Clients.

Prohibited Behavior for Twenty Bridge Staffing-Sponsored and Non-Twenty Bridge Staffing Blogs

Employees must always comply with Twenty Bridge Staffing's policies regarding non-disclosure

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of proprietary, confidential and personal information, while on Twenty Bridge Staffing and non-Twenty Bridge Staffing blogs. Accordingly, employees are prohibited from:

- Revealing, or making any reference to, any proprietary or confidential information, trade secrets, or other information covered by such policy. Even vague or disguised references to such information could violate Twenty Bridge Staffing policies and applicable laws.
- Posting any information which violates laws regarding libel, defamation, copyrights, trademarks, data theft, disclosure of material non-public information, disclosure of confidential or trade secret information, harassment or privacy.
- Re-publishing postings or statements of other Twenty Bridge Staffing employees.
- Using Twenty Bridge Staffing logos, trademarks or other intellectual property or adding a link to Twenty Bridge Staffing's website without Twenty Bridge Staffing's written permission.
- Identifying a competitor and openly advertising or promoting for the competitor to the potential detriment of Twenty Bridge Staffing.
- Identifying a Twenty Bridge Staffing client, partner, vendor, supplier or affiliate by name, and discussing the confidential information of a Twenty Bridge Staffing client, partner, vendor, and supplier or affiliate online.
- Posting any content that is harassing, discriminatory, defamatory, threatening, disparaging, libelous or otherwise illegal or injurious.
- Posting comments that are openly critical or hostile of the countries to which they travel.
- Using non-Twenty Bridge Staffing blogs for internal business-related communications between fellow employees.

Non-Twenty Bridge Staffing blog postings may generate media interest or coverage. Employees are not authorized to speak on behalf of Twenty Bridge Staffing. If a member of the media contacts an employee about a Twenty Bridge Staffing related posting or online comment published by the employee, or requests Twenty Bridge Staffing information of any kind, the employee must not provide any information and should contact Twenty Bridge Staffing's president or HR@twentybridge.com immediately.

EXTERNAL COMMUNICATIONS

Occasionally, an employee may be contacted by outside sources requesting information about Twenty Bridge Staffing matters, including information regarding current or former employees, Twenty Bridge Staffing projects, or other workplace issues. In order to avoid providing inaccurate or incomplete information to outside sources, and the possible negative exposure that may result from providing information about Twenty Bridge Staffing, or its contracts, clients or employees to outside sources, any employee contacted by any outside source regarding Twenty Bridge Staffing should immediately contact HR@twentybridge.com as detailed below.

Media Contacts

If an employee is contacted by a representative from any media organization, (e.g., television, radio, or newspaper reporters), the employee should immediately refer the media representative to HR@twentybridge.com.

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Outside Attorneys and Investigators

If an employee is contacted by an outside attorney or investigator regarding Twenty Bridge Staffing business including information regarding current or former employees, Twenty Bridge Staffing clients, Twenty Bridge Staffing contracts or other matters, or other workplace issues, the employee should immediately contact HR@twentybridge.com.

Employment References and Verification

Employees contacted by an outside source requesting employment verification for a current or former employee should not provide any information to the requesting individual or organization. Employees should refer the requesting individual or organization to HR@twentybridge.com. No employee, other than the Human Resources Department personnel is authorized to provide employment verification for any current or former employee.