



Code of Conduct

Vangst Temp, LLC
Updated October 1, 2018

This Code of Conduct does not create any contractual rights of any kind between Vangst Temp, LLC (“Vangst GIGs”, “Vangst”) and its employees. In addition, all employees should understand that this Code does not modify their employment relationship, whether at-will or governed by contract.

Purpose

Vangst GIGs Code of Conduct outlines the standards of ethical behavior Vangst GIGs expects from its employees. We expect all of our employees and stakeholders to know and follow the Code in letter and in spirit. Failure to do so can result in disciplinary action, including termination of employment.

Moreover, while the Code is specifically written for Vangst GIGs employees and stakeholders, we expect Vangst GIGs contractors, consultants, and others who may be temporarily assigned to perform work or services for Vangst GIGs to follow the Code in connection with their work for us. Failure of a contractor, consultant, company, client or other covered service provider to follow the Code can result in termination of their relationship with Vangst GIGs.

If you feel that Vangst GIGs or it’s employees are in violation of this code, you should report suspected violations to your supervisor or directly to our Human Resources Department right away. We want to hear from you! If you have questions concerning the proper course of action, please consult your immediate supervisor or other appropriate managers or personnel for direction.

Individual Responsibility

You represent Vangst GIGs. Therefore, you have a responsibility to act with honesty, integrity and within the parameters of our policies. You also have a responsibility to voice concerns if you

know or suspect fellow employees are acting contrary to existing policies. When someone compromises our company values, vision or mission, you should either inform them directly or use other available channels to voice your concerns.

Fair and Honest Dealing

You must deal fairly and honestly with our employees, contractors, shareholders, clients, suppliers, competitors, and other entities with whom Vangst GIGs deals. You must behave in an ethical manner and not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair dealing practice.

Build Trust, Respect and Credibility

The success of our business is dependent on the trust and confidence we earn from our employees, customers, clients and shareholders. 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. Ultimately, we will be judged on what we do.

We all deserve to work in an environment where we are treated with dignity and respect. Vangst GIGs is committed to creating an environment where everyone is treated with dignity and respect. Vangst GIGs is an equal employment/affirmative action employer and is committed to providing a workplace that is free of discrimination of all types and from abusive, offensive or harassing behavior. Any employee who feels harassed or discriminated against should report the incident to his or her manager or to human resources.

Compliance with Laws, Rules and Regulations

Vangst GIGs' commitment to integrity begins with complying with laws, rules and regulations where we do business. Further, each of us must have an understanding of the company policies, laws, rules and regulations that apply to our specific roles. If we are unsure of whether a contemplated action is permitted by law or Vangst GIGs policy, we should seek the advice from the resource expert. We are responsible for preventing violations of law and for speaking up if we see possible violations.

Competition

We are dedicated to ethical, fair and vigorous competition. We will sell Vangst GIGs products and services based on their merit, superior quality, functionality and competitive pricing. We will make independent pricing and marketing decisions and will not improperly cooperate or coordinate our activities with our competitors. We will not offer or solicit improper payments or

gratuities in connection with the purchase of goods or services for Vangst GIGs or the sales of its products or services, nor will we engage or assist in unlawful boycotts of particular customers.

Proprietary Information

It is important that we respect the property rights of others. We will not acquire or seek to acquire improper means of a competitor's trade secrets or other proprietary or confidential information. We will not engage in unauthorized use, copying, distribution or alteration of software or other intellectual property.

Selective Disclosure

We will not selectively disclose (whether in one-on-one or small discussions, meetings, presentations, proposals or otherwise) any material nonpublic information with respect to Vangst GIGs, its securities, business operations, plans, financial condition, results of operations or any development plan. We should be particularly vigilant when making presentations or proposals to customers to ensure that our presentations do not contain material nonpublic information.

Health and Safety

Vangst GIGs is dedicated to maintaining a healthy environment. A safety manual has been designed to educate you on safety in the workplace. If you do not have a copy of this manual, please see the HR department.

Conflicts of Interest

We must avoid any relationship or activity that might impair, or even appear to impair, our ability to make objective and fair decisions when performing our jobs. At times, we may be faced with situations where the business actions we take on behalf of Vangst GIGs may conflict with our own personal or family interests. We owe a duty to Vangst GIGs to advance its legitimate interests when the opportunity to do so arises. We must never use Vangst GIGs property or information for personal gain or personally take for ourselves any opportunity that is discovered through our position with Vangst GIGs.

Here are some other ways in which conflicts of interest could arise:

1. Being employed (you or a close family member) by, or acting as a consultant to, a competitor or potential competitor, supplier or contractor, regardless of the nature of the employment, while you are employed with Vangst GIGs.
2. Hiring or supervising family members or closely related persons.

3. Serving as a board member for an outside commercial company or organization.
4. Owning or having a substantial interest in a competitor, supplier or contractor.
5. Having a personal interest, financial interest or potential gain in any Vangst GIGs transaction.
6. Placing company business with a firm owned or controlled by a Vangst GIGs employee or his or her family.
7. Accepting gifts, discounts, favors or services from a customer/potential customer, competitor or supplier, unless equally available to all Vangst GIGs employees.

Determining whether a conflict of interest exists is not always easy to do. Employees with a conflict of interest question should seek advice from management. Before engaging in any activity, transaction or relationship that might give rise to a conflict of interest, employees must seek review from their managers or the HR department.

Gifts, Gratuities and Business Courtesies

Vangst GIGs is committed to competing solely on the merit of our products and services. We should avoid any actions that create a perception that favorable treatment of outside entities by Vangst GIGs was sought, received or given in exchange for personal business courtesies. Business courtesies include gifts, gratuities, meals, refreshments, entertainment or other benefits from persons or companies with whom Vangst GIGs does or may do business. We will neither give nor accept business courtesies that constitute, or could reasonably be perceived as constituting, unfair business inducements that would violate law, regulation or policies of Vangst GIGs or customers, or would cause embarrassment or reflect negatively on Vangst GIGs' reputation.

Accepting Business Courtesies

Most business courtesies offered to us in the course of our employment are offered because of our positions at Vangst GIGs. We should not feel any entitlement to accept and keep a business courtesy. Although we may not use our position at Vangst GIGs to obtain business courtesies, and we must never ask for them, we may accept unsolicited business courtesies that promote successful working relationships and good will with the firms that Vangst GIGs maintains or may establish a business relationship with.

Employees who award contracts or who can influence the allocation of business, who create specifications that result in the placement of business or who participate in negotiation of contracts must be particularly careful to avoid actions that create the appearance of favoritism or that may adversely affect the company's reputation for impartiality and fair dealing. The prudent course is to refuse a courtesy from a supplier when Vangst GIGs is involved in choosing or reconfirming a supplier or under circumstances that would create an impression that offering courtesies is the way to obtain Vangst GIGs business.

Meals, Gifts and Entertainment

We may accept occasional meals, refreshments, entertainment and similar business courtesies that are shared with the person who has offered to pay for the meal or entertainment, provided that:

- They are not inappropriately lavish or excessive.
- The courtesies are not frequent and do not reflect a pattern of frequent acceptance of courtesies from the same person or entity.
- The courtesy does not create the appearance of an attempt to influence business decisions, such as accepting courtesies or entertainment from a supplier whose contract is expiring in the near future.
- The employee accepting the business courtesy would not feel uncomfortable discussing the courtesy with his or her manager or co-worker or having the courtesies known by the public.

Employees may accept unsolicited gifts, other than money, that conform to the reasonable ethical practices of the marketplace, including:

- Flowers, fruit baskets and other modest presents that commemorate a special occasion.
- Gifts of nominal value, such as calendars, pens, mugs, caps and t-shirts (or other novelty, advertising or promotional items).

Generally, employees may not accept compensation, honoraria or money of any amount from entities with whom Vangst GIGs does or may do business. Tangible gifts (including tickets to a sporting or entertainment event) that have a market value greater than \$100 may not be accepted unless approval is obtained from management.

Employees with questions about accepting business courtesies should talk to their managers or the HR department.

Offering Business Courtesies

Any employee who offers a business courtesy must assure that it cannot reasonably be interpreted as an attempt to gain an unfair business advantage or otherwise reflect negatively upon Vangst GIGs. An employee may never use personal funds or resources to do something that cannot be done with Vangst GIGs resources. Accounting for business courtesies must be done in accordance with approved company procedures.

Other than to our government customers, for whom special rules apply, we may provide nonmonetary gifts (i.e., company logo apparel or similar promotional items) to our customers.

Further, management may approve other courtesies, including meals, refreshments or entertainment of reasonable value, provided that:

- The practice does not violate any law or regulation or the standards of conduct of the recipient's organization.
- The business courtesy is consistent with industry practice, is infrequent in nature and is not lavish.
- The business courtesy is properly reflected on the books and records of Vangst GIGs.

Accurate Public Disclosures

We will make certain that all disclosures made in financial reports and public documents are full, fair, accurate, timely and understandable. This obligation applies to all employees, including all financial executives, with any responsibility for the preparation for such reports, including drafting, reviewing and signing or certifying the information contained therein. No business goal of any kind is ever an excuse for misrepresenting facts or falsifying records.

Employees should inform Management and the HR department if they learn that information in any filing or public communication was untrue or misleading at the time it was made or if subsequent information would affect a similar future filing or public communication.

Corporate Recordkeeping

We create, retain and dispose of our company records as part of our normal course of business in compliance with all Vangst GIGs policies and guidelines, as well as all regulatory and legal requirements.

All corporate records must be true, accurate and complete, and company data must be promptly and accurately entered in our books in accordance with Vangst GIGs and other applicable accounting principles.

We must not improperly influence, manipulate or mislead any unauthorized audit, nor interfere with any auditor engaged to perform an internal independent audit of Vangst GIGs books, records, processes or internal controls.

Accountability

Each of us is responsible for knowing and adhering to the values and standards set forth in this Code and for raising questions if we are uncertain about company policy. If we are concerned whether the standards are being met or are aware of violations of the Code, we must contact the HR department.

Vangst GIGs takes seriously the standards set forth in the Code, and violations are cause for disciplinary action up to and including termination of employment.

Confidential and Proprietary Information

Integral to Vangst GIGs business success is our protection of confidential company information, as well as nonpublic information entrusted to us by employees, customers and other business partners. Confidential and proprietary information includes such things as pricing and financial data, customer names/addresses or nonpublic information about other companies, including current or potential supplier and vendors. We will not disclose confidential and nonpublic information without a valid business purpose and proper authorization.

Use of Company Resources

Company resources, including time, material, equipment and information, are provided for company business use. Nonetheless, occasional personal use is permissible as long as it does not affect job performance or cause a disruption to the workplace.

Employees and those who represent Vangst GIGs are trusted to behave responsibly and use good judgment to conserve company resources. Managers are responsible for the resources assigned to their departments and are empowered to resolve issues concerning their proper use.

Generally, we will not use company equipment such as computers, copiers and fax machines in the conduct of an outside business or in support of any religious, political or other outside daily activity, except for company-requested support to nonprofit organizations. We will not solicit contributions nor distribute non-work related materials during work hours.

In order to protect the interests of the Vangst GIGs network and our fellow employees, Vangst GIGs reserves the right to monitor or review all data and information contained on an employee's company-issued computer or electronic device, the use of the Internet or Vangst GIGs' intranet. We will not tolerate the use of company resources to create, access, store, print, solicit or send any materials that are harassing, threatening, abusive, sexually explicit or otherwise offensive or inappropriate.

Questions about the proper use of company resources should be directed to your supervisor or Customer Success Team.

Media Inquiries

Vangst GIGs is a high-profile company in our industry, and from time to time, employees may be approached by reporters and other members of the media. In order to ensure that we speak with one voice and provide accurate information about the company, we should direct all media

inquiries to the Customer Success Team. No one may issue a press release without first consulting with the the Vangst PR Team.

Do the Right Thing

Several key questions can help identify situations that may be unethical, inappropriate or illegal.

Ask yourself:

- Does what I am doing comply with the Vangst GIGs guiding principles, Code of Conduct and company policies?
- Have I been asked to misrepresent information or deviate from normal procedure?
- Would I feel comfortable describing my decision at a staff meeting?
- How would it look if it made the headlines?
- Am I being loyal to my family, my company and myself?
- What would I tell my child to do?
- Is this the right thing to do?

Acknowledgement

I certify that I have received the Vangst GIGs Code of Conduct and I have read or agree to read the information contained within.

I agree to comply with Vangst GIGs Code of Conduct and other policies and procedures and understand that compliance with these policies is a condition of my continued employment with Vangst GIGs. I understand that the Code of Conduct does not create any contractual employment rights of any kind between Vangst GIGs and myself. I also understand that violation of the Code of Conduct may lead to disciplinary action up to and including termination of my employment with Vangst GIGs.

Employee Name

Employee Signature

Date

