



COMPLIANCE & ETHICS HOTLINE POLICY

INTRODUCTION:

MHS Holdings, Inc. and its subsidiaries (“MHS” or “we”) are committed to the highest standards of ethical and legal business conduct. We are committed to open communication and encourage you to raise your concerns to your supervisor, your business partner from Human Resources or anyone in a senior management role. However, we understand that there are circumstances where you may prefer to remain anonymous. This Policy is designed to enhance our existing open-door policies and procedures and provide a confidential and anonymous reporting mechanism for employees and other interested third parties to report known or suspected illegal, unethical or improper conduct without regard to rank or fear of retaliation.

SCOPE:

This Policy applies to all officers, employees, consultants, trainees, interns, agents, suppliers, subcontractors, service providers and any other third party in a business relationship with MHS, wherever located. This Policy extends to all of MHS domestic and foreign operations.

POLICY:

This Policy is intended to cover serious legal or ethical concerns that may have a significant adverse effect on MHS or our employees, including without limitation:

- Accounting irregularities;
- Unlawful conduct;
- Violation of MHS Code of Conduct and other company policies or procedures; or
- Any act or omission of act that otherwise amounts to serious improper conduct.

By way of example and not limitation, some common concerns that could be reported via the hotline include:

- Accounting misrepresentations or falsification
- Fraud, theft, embezzlement
- Bribery or kickbacks
- Workplace violence or substance abuse

You are encouraged to report regular business matters directly to your immediate supervisor, appropriate members of the Human Resources or Legal department, the executive in charge of the applicable business unit, or to the chief executive officer, chief operation officer, chief financial officer or chief human resources officer.

PROCEDURE:

Reporting

The Compliance & Ethics Hotline is hosted by Lighthouse Services, an independent third-party provider. The hotline is available 24 hours, seven days per week. You may submit a report to the hotline using any of the methods below:

- **Website:** www.lighthouse-services.com/mhsglobal
- **Toll-Free Telephone:**
 - English speaking USA and Canada: 833-490-0001
 - Spanish speaking USA and Canada: 800-216-1288
 - French speaking Canada: 855-725-0002
 - Spanish speaking Mexico: 01-800-681-5340
 - All other countries: 800-603-2869 (must dial country access code first; see attached for access codes and dialing instructions)
- **E-mail:** reports@lighthouse-services.com (must include MHS name with report)
- **Fax:** (215) 689-3885 (must include MHS name with report)

Mobile app versions are also available in [Apple's App Store](#) and [Google's Play Store](#). You can download the app to submit and track reports using your mobile devices. When using the mobile app version, you will be asked to enter the organization's keyword, which is **mhsglobal**.

Please note that the information provided by you may be the basis of an internal and/or external investigation into the issue you are reporting and your anonymity will be protected to the maximum extent permitted by law. However, your identity may become known during the course of the investigation because of the information you have provided.

This Policy should be used in good faith. Malicious allegations or any misuse of this Policy is damaging to MHS and your fellow colleagues and could lead to disciplinary actions.

Investigation

MHS Compliance & Integrity Committee (the "Committee") is responsible for the administration, oversight and training with regard to performance under this Policy. The Committee may delegate certain tasks as necessary or appropriate to fulfil the required duties and will remain in charge of overseeing any such delegation. For all types of hotline reports, an initial review and assessment will be made to determine whether an investigation is appropriate, and the form that it should take. Consideration will be given to:

- The severity of the issue raised;
- The credibility of the concern; and
- The likelihood of confirming the allegation from attributable sources.

Some concerns may be resolved by agreed upon action without the need for an investigation. MHS aims to keep you informed of the progress and/or outcome, however, due to legal requirements or the need for confidentiality, it is in the sole discretion of MHS to decide whether to keep you informed and to what extent you will be informed.

NO RETALIATION:

MHS is committed to ensuring that anyone can speak up with confidence if they have any concerns or need to ask for help. We do not allow any form of retaliation against anyone who reports known or suspected violations in good faith. Individuals who have been found to retaliate or discriminate will be subject to discipline up to and including termination of employment.