

## CODE OF ETHICS AND BEST PRACTICES

The successful business operations of Exquisite Staffing Solutions, LLC (Exquisite Staffing) are built upon the principles of fair dealing and ethical conduct of our employees. Our reputation for integrity and excellence requires careful observance of the spirit and letter of all applicable laws and regulations, as well as a scrupulous regard for the highest standards of conduct and personal integrity.

### Our Mission

Our core mission is to provide employment opportunities to the medical workforce while providing excellent healthcare services to the industry and its recipients.

### Our Vision

Exquisite Staffing is envisioned towards becoming the premier healthcare staffing agency throughout the country. We seek to empower the healthcare industry and the communities we serve. Our company is committed to being reputable and reliable, ensuring that our in-house staff, field personnel, and clientele uphold the same standards as our organization. We want to provide excellent healthcare services to the industry and its patients.

### Key Values

- To comply with all laws and regulations applicable to the business and to maintain high standards of ethical conduct in the operation of the business and the dealings with employees, clients, and competitors.
- Strive for excellence in job performance.
- Follow company guidelines.
- Maintain a positive attitude, to be honest in all dealings and to use a cooperative team approach.

### Compliance with Laws

Exquisite Staffing will comply with all applicable laws and regulations and expects its directors, officers, employees, clients, and vendors to conduct business in accordance with the letter, spirit, and intent of all relevant laws and to refrain from any illegal, dishonest, or unethical conduct.

### Harassment, Discrimination and Bullying

Exquisite Staffing prohibits all forms of unlawful discrimination and harassment. If you believe you've been bullied, harassed, or discriminated against by anyone at Exquisite Staffing, or an affiliate of Exquisite Staffing, we strongly encourage you to immediately report the incident to Management at Exquisite Staffing Solutions according to the Complaint Procedure or Open-Door Policy. Management will promptly and thoroughly investigate any complaints and take appropriate action required.

### Privacy and Security

Exquisite Staffing is committed to protecting the privacy of its employees. It is the policy of Exquisite Staffing to fully comply with various privacy regulations including, but not limited to, the Health Insurance Portability and Accountability Act (HIPAA), the Genetic Information Nondiscrimination Act and the Social Security Number Privacy Act. Protected personally identifiable information that is received, maintained, or transmitted is reasonably and appropriately protected through various standards and safeguards. Your personally identifiable information includes, but is not limited to, your social security number and protected health information. All company laptops are encrypted and when transmitting files containing personally identifiable information via email, the file should be encrypted.

## Safety

We are committed to providing a safe environment that poses no risk of an “Immediate Threat to Health or Safety” to any of our employees. Therefore, all employees are prohibited from possessing, distributing, or discharging loaded or unloaded firearms while working on any Company property or when representing the Company. Also, we have a zero-tolerance policy for using, consuming, possessing, and selling of any controlled or illegal substance in the workplace or while conducting business.

## Professionalism and Office Conduct

Employees are expected to use common sense, good judgement and to demonstrate professionalism in all employment related dealings with employees, customers, vendors, and coworkers. Employees shall not engage in personal conduct that may conflict with the interests of the company or its clients.

## Responsibilities of Exquisite Staffing and its employees

- To ensure that the Company’s employees, clients, and associates are aware of and understand the responsibilities of the Code of Ethics.
- To comply with all laws and regulations applicable to their business, and to maintain high standards of ethical conduct in the operation of that business and in their dealings with employees, clients, and competitors.
- To treat all applicants and employees with dignity and respect, and to provide equal employment opportunities, based on bona fide job qualifications, without regard to race, color, religion, national origin, sex, sexual orientation, age, disability, or any basis prohibited by applicable law.
- To maintain high standards of integrity in all advertising and to assign the best qualified employees to fill clients’ needs.
- To determine the experience and qualifications of applicants and employees as the staffing firm deems appropriate to the circumstances, or as may be required by law.
- To explain to employees prior to assignment their wage rate, applicable benefits, hours of work, and other assignment conditions—and to promptly pay any wages and benefits due in accordance with the terms of their employment and applicable legal requirements.
- To encourage employees to upgrade their skills.
- To satisfy all applicable employer obligations, including payment of the employer’s share of social security, state and federal unemployment insurance taxes, and workers’ compensation—and to explain to employees that the staffing firm is responsible for such obligations.
- To ascertain that employees are assigned to work sites that are safe, that they understand the nature of the work the client has called for and can perform such work without injury to themselves or others, and that they receive any personal safety training and equipment that may be required.
- To take prompt action to address employee questions, concerns, or complaints regarding unsafe work conditions, discrimination, or any other matter involving the terms and conditions of their employment.
- To confirm the employees’ periods of service upon request by a subsequent employer and with the consent of the employee.
- All employees are expected and required to provide excellence in healthcare services in response to the needs of the client. Services will consistently meet the highest standards of quality care.
- All employees are required to maintain accurate and organized documentation. Under no circumstances may any documents be falsified or wrongfully destroyed.
- Employees are not to accept gifts that could be seen by others to have an effect on your judgment of actions with respect to company activities.
- Employees shall not engage in personal conduct that may conflict with the interests of the company or its clients.
- All employees are responsible for conducting their jobs in a manner reflecting standards of ethics that are consistent with accepted criteria for personal integrity.
- Preserving Exquisite Staffing’s reputation for integrity and professionalism is an important objective. The manner in which employees carry out their responsibilities is as important as the results they achieve.
- All activities are to be conducted in compliance with both the letter of the law and spirit of the law, regulations, and judicial decrees.
- No employee should, at any time, take any action on behalf of Exquisite Staffing, which is known or should be known to violate any law or regulation.
- Marketing materials, regardless of medium, shall accurately describe the services, facilities, and resources of Exquisite Staffing.

- To maintain high standards of performance, Exquisite Staffing employs only those individuals it believes are most qualified without regard to race, color, religion, sex, age, national origin, handicap or disability in compliance with all federal and state laws regarding discrimination.
- Employees that are licensed or certified in any profession shall follow all applicable rules and professional codes of conduct pertaining to that profession, in addition to the rules stated herein.
- Exquisite Staffing prohibits field staff from discussing pay rates or special rates of Exquisite Staffing with other healthcare providers.
- Employees are not authorized to issue any statement, written or oral, to any news media representative or grant any public interview pertaining to the company's operations or financial matters.
- Partner with clients and vendors who can meet all contractual responsibilities and obligations in a conscientious and honest manner.
- Work with clients and vendors who initiate resolution of concerns as they become known.
- Provide a respectful and safe work environment for all of Exquisite Staffing employees.

## Client Expectations

- Read and understand the Code of Ethics for Exquisite Staffing and seek additional meaning if necessary.
- Meet all contractual responsibilities and obligations in a conscientious and honest manner.
- Initiate resolution of concerns as they become known.
- Provide a respectful and safe work environment for all of Exquisite Staffing employees.

## Conflict of Interest

A conflict of interest occurs when a person's personal interest may interfere in any way with the performance of his or her duties or the best interests of Exquisite Staffing. A conflicting personal interest could result from an expectation of personal gain now or in the future or from a need to satisfy a prior or concurrent personal obligation. Exquisite Staffing expects all employees to be free from influences that conflict with the best interests of the company. Even the appearance of a conflict of interest where none exists can be damaging and should be avoided. Whether a conflict of interest exists or will exist can be unclear. Conflicts of interest are prohibited unless specifically authorized as described below.

If you have any questions about a potential conflict or if you become aware of an actual or potential conflict, and you are not an officer or director of Exquisite Staffing, please discuss the matter with the Chief Executive Officer of Exquisite Staffing.

Factors that may be considered in evaluating a potential conflict of interest are, among others:

- whether it may interfere with the employee's job performance, responsibilities, or morale;
- whether the employee has access to confidential information;
- whether it may interfere with the job performance, responsibilities, or morale of others within the organization;
- any potential adverse or beneficial impact on our business;
- any potential adverse or beneficial impact on our relationships with our customers or suppliers or other service providers;
- whether it would enhance or support a competitor's position;
- the extent to which it would result in financial or other benefit (direct or indirect) to the employee;
- the extent to which it would result in financial or other benefit (direct or indirect) to one of our customers, suppliers, or other service providers; and
- the extent to which it would appear improper to an outside observer.

The following are examples of situations that may, depending on the facts and circumstances, involve conflicts of interests:

- Employment by (including consulting for) or service on the board of a competitor, customer or supplier or other service provider. Activity that enhances or supports the position of a competitor to the detriment of Exquisite Staffing is prohibited, including employment by or service on the board of a competitor. Employment by or

service on the board of a customer or supplier or other service provider is generally discouraged, and you must seek authorization in advance if you plan to take such action.

- Owning, directly or indirectly, a significant financial interest in any entity that does business, seeks to do business, or competes with us. In addition to the factors described above, persons evaluating ownership for conflicts of interest will consider the size and nature of the investment; the nature of the relationship between the other entity and Exquisite Staffing; the employee's access to confidential information and the employee's ability to influence Peet's decisions. If you would like to acquire a financial interest of that kind, you must seek approval in advance.
- Soliciting or accepting gifts, favors, loans or preferential treatment from any person or entity that does business or seeks to do business with us.
- Soliciting contributions to any charity or for any political candidate from any person or entity that does business or seeks to do business with us.
- Taking personal advantage of corporate opportunities.
- Conducting our business transactions with your family member, significant other or person who shares your household or a business in which you have a significant financial interest.
- Exercising supervisory or other authority on behalf of Exquisite Staffing over a co-worker who is also a family member. The employee's supervisor and/or Human Resources will consult with the Legal Department to assess the advisability of reassignment.
- Loans to, or guarantees of obligations of, employees or their family members by Exquisite Staffing could constitute an improper personal benefit to the recipients of these loans or guarantees, depending on the facts and circumstances.