

## Build Trust and Credibility

The success of our business is dependent on the trust and confidence we earn from our clients, independent contractors, team members and partners. 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.

When considering any action, it is wise to ask:

- Will this build trust and credibility for ORCVirtual, Inc.?
- Will it help create a working environment in which ORCVirtual, Inc. can succeed over the long term?
- Is the commitment I am making one I can follow through with?

The only way we will maximize trust and credibility is by answering “yes” to those questions and by working every day to build our trust and credibility.

## Respect for the Individual

We all deserve to work in an environment where we are treated with dignity and respect. ORCVirtual, Inc. is committed to creating such an environment because it brings out the full potential in each of us, which, in turn, contributes directly to our business success. We cannot afford to let anyone’s talents go to waste.

At ORCVIRTUAL, INC. we work to create an open atmosphere of trust, honesty and respect. Harassment or discrimination of any kind – including that involving race, color, religion, gender, age, national origin, citizenship, mental or physical disabilities, sexual orientation, gender identity, veteran status, or any other similarly protected status – is unacceptable. This principle applies to all aspects of employment, membership, and 1099 workers, including recruitment, hiring, placement, transfer, promotion, layoff, recall, termination,

and other terms and conditions.

We recruit, process and assign all independent contractors on the basis of their qualifications for the particular job, and we do so without regard to any factor unrelated to their ability to fulfill job requirements.

To comply with applicable laws and ensure equal employment opportunities to qualified individuals with a disability, we will make reasonable accommodations for the known physical or mental limitations of an otherwise qualified individual with a disability who is an applicant, member, partner or 1099 worker, unless undue hardship would result.

## Create a Culture of Open and Honest Communication

At ORCVirtual, Inc. everyone should feel comfortable to speak his or her mind, particularly with respect to ethics concerns. Our Board of Directors and Officers have a responsibility to create an open and supportive environment where everyone feels comfortable raising such questions. We all benefit tremendously when we exercise our power to prevent mistakes or wrongdoing by asking the right questions at the right times.

ORCVirtual, Inc. will investigate all reported instances of questionable or unethical behavior. In every instance where improper behavior is found to have occurred, the company will take appropriate action. We will not tolerate retaliation against anyone who raises genuine ethics concerns in good faith.

Management has the added responsibility for demonstrating, through their actions, the importance of this Code. In any business, ethical behavior does not simply happen; it is the product of clear and direct communication of behavioral expectations, modeled from the top and demonstrated by example. Again, ultimately, our actions are what matters.

To make our Code work, the Board of Directors and Officers will be responsible for promptly addressing ethical questions or concerns raised by anyone and

for taking the appropriate steps to deal with such issues. They should not consider anyone's ethics concerns as threats or challenges to their authority, but rather as another encouraged form of business communication. At ORCVirtual, Inc. we want the ethics dialogue to become a natural part of daily work.

## Uphold the Law

ORCVirtual, Inc.'s 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 ORCVirtual, Inc. 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 ORCVirtual, Inc. 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 ORCVirtual, Inc. 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 ORCVirtual, Inc. 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

ORCVirtual, Inc. is dedicated to maintaining a healthy environment and will work with all 1099 contractors to help them do the same in their work space.

## 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 ORCVirtual, Inc. may conflict with our own personal or family interests. We owe a duty to ORCVirtual, Inc. to advance its legitimate interests when the opportunity to do so arises. We must never use ORCVirtual, Inc. property or information for personal gain or personally take for ourselves any opportunity that is discovered through our position with ORCVirtual, Inc.

Determining whether a conflict of interest exists is not always easy to do. Anyone with a conflict of interest question should seek advice from a member of the Board of Directors.

## Accepting Business Courtesies

Most business courtesies offered to us in the course of our partnership are offered because of our positions at ORCVirtual, Inc. We should not feel any entitlement to accept and keep a business courtesy. Although we may not use our position at ORCVirtual, Inc. 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 ORCVirtual, Inc. maintains or may establish a business relationship with.

## Promote Substance Over Form

At times, we are all faced with decisions we would rather not have to make and issues we would prefer to avoid. Sometimes, we hope that if we avoid confronting a problem, it will simply go away.

At ORCVirtual, Inc. we must have the courage to tackle the tough decisions and make difficult choices, secure in the knowledge that ORCVirtual, Inc. is committed to doing the right thing. At times this will mean doing more than simply what the law requires. Merely because we can pursue a course of action does not mean we should do so.

Although ORCVirtual, Inc.'s guiding principles cannot address every issue or provide answers to every dilemma, they can define the spirit in which we intend to do business and should guide us in our daily conduct.

## 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 a member of the Board of Directors.

ORCVirtual, Inc. takes seriously the standards set forth in the Code, and violations are cause for disciplinary action up to and including termination of any agreement, membership or contract.

## Confidential and Proprietary Information

Integral to ORCVirtual, Inc.'s business success is our protection of confidential company information, as well as nonpublic information entrusted to us by partners, 1099 workers, members, 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.

In order to protect the interests of the ORCVirtual, Inc. network and our fellow 1099 workers, partners, members and clients, ORCVirtual, Inc. reserves the right to monitor or review all data and information contained on a company-issued computer or electronic device, the use of the Internet or ORCVirtual, Inc.'s 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.

Approved by The Board of Directors; March 1, 2016