

employbridge™



**Championing People.
Unlocking Potential.**



Code of Conduct



Colleagues,

Our Code of Conduct reaffirms our commitment to high standards of ethical conduct and reinforces our business principles, policies, and procedures. In many instances, it goes beyond what might be required by law, and speaks to our core values – staying true to our goal of leading the industry and the constituency groups we serve by putting relationships first, seeing further, being better always and winning as one. It is our guide on the bridge to better. Treating this Code with the respect it deserves isn't just about adherence to expected conduct – it's about being the best version of our company and ourselves for our colleagues, talent, clients, and communities.

This Code of Conduct applies to all colleagues/employees of Employbridge and each of the entities the company controls, including subsidiary brands, as well as external agents and representatives, consultants, independent contractors, and others acting on the company's behalf.

The Board of Directors and the senior leadership team wholly support our Code of Conduct and are steadfastly committed to ensuring that we all live up to the principles of this document. We expect that every stakeholder will read, comply with, and be willing ambassadors in upholding our Code of Conduct.

Thank you,

Billy Milam

Billy Milam
Chief Executive Officer



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Our Purpose and Values

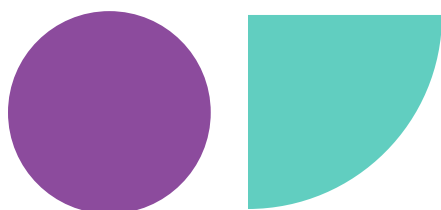
Our Purpose

Championing People
Unlocking Potential.



Our Values

Our values guide us as we strive to serve as a Bridge to Better.



Better, always

We never settle, excellence has no finish line.

Win as one

We lead with encouragement, embrace the challenges that make us stronger.

See further

We collaborate to unlock opportunities by using our open minds and expertise.

Relationships first

We value relationships above all else.

About Our Code

As a values-driven company, we are passionate about contributing to the collective success of our colleagues, talent, clients, and communities; and we believe that promoting a positive culture of equity, compliance, and integrity leads to that success. As we strive to serve as a Bridge to Better, our values and our Code of Conduct (“Code”) are our guide.

While it cannot cover every possible situation, our Code, along with our Company policies, provides guidance on:

- acting with ethics and integrity,
- complying with the laws, rules, and regulations that apply to our business,
- where to go for additional information, advice, and guidance when we need it, and
- using our voice to speak up if we see something that doesn't align with our values, the law, or this Code.

Our Code applies to all employees (also known as colleagues and talent), officers, and directors of Employbridge Holding Company, our subsidiaries, and controlled entities (collectively referred to as “Employbridge” or the “Company” in this document). We are expected to comply with the Code whenever we are representing the Company – whether we are in the office, working remotely, traveling on behalf of the Company, at a client site, or meeting with a colleague or client to share a beverage or meal. We also expect our contractors, agents, suppliers, business partners, and anyone who works on behalf of our Company to comply with the standards outlined in our Code.

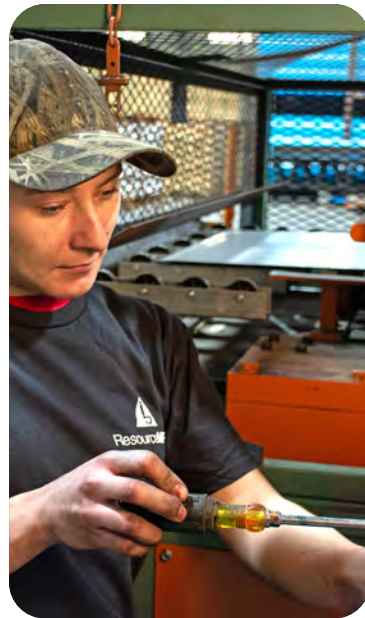


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Our Responsibility



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Building a positive culture of equity, compliance, and integrity requires the commitment of each of us.

We are each responsible to:

- be honest, ethical and treat each other with respect;
- read, understand and comply with the Code, Company policies and the law;
- complete required training and actively participate in compliance program efforts;
- speak up if we have questions or concerns and encourage others to do the same; and
- cooperate fully in the investigation of any possible violation of our Code, our policies, or the law.

Leaders have additional responsibilities to:

- lead with encouragement;
- **champion people** and help others to **unlock their potential** by providing the support and guidance they need;
- set an example and clearly communicate expectations for ethical behavior and performance;
- promote an inclusive workplace where everyone feels they belong; and
- create an environment of openness and trust where everyone feels safe to speak up without fear of retaliation.

Find the Right Path

With some issues, the right path is clear. For example, if the question is a matter of complying with the law – we comply with the law. Other matters may not be so clear, and we may need help to find the right path.

When faced with a difficult decision, follow these steps to help you Find the Right Path:

Gather the facts.

Be sure you have all the facts you need to make the best decision. This includes whether your decision or action is consistent with our values, the Code, Company policies and the law.

Clarify your responsibility

Be clear on what you are being asked to do and whether there are others that may share responsibility for this decision or action. Discussing the matter with those who have shared responsibility may make the right path clearer.



Recognize the consequences

Understand the impact this decision or action may have on yourself, the Company and others. Is it fair and just? Could anyone be harmed? Would you be comfortable if your decision or action became public knowledge?

Seek advice and guidance from your manager and others with the appropriate authority.

It is always best to discuss the matter with your manager and others that have the experience and expertise needed to help you find the right path. If in doubt, you can reach out to a member of Human Resources (also known as the People Department) or the Legal Department. Contact information for each of these departments is included at the end of this document.

Speak Up

We strive to be **better, always**. That means we never settle, and we seek to continuously improve in all things. We rely on each other to speak up when we see something that we believe is, or may be, a violation of the law, Company policies, or this Code so that it can be properly addressed. This includes possible violations by our colleagues, suppliers, business partners, clients, or anyone else acting on behalf of the Company. Dishonest or unethical conduct can harm the Company's reputation and compromise the trust our colleagues, clients, and business partners have in us. Speaking up promptly to raise a concern in good faith is our duty and the right thing to do. We will not tolerate retaliation against anyone for raising a concern in good faith or for participating in an investigation of a possible violation of the Code, Company policy or the law.

When you have a concern, it may be best to speak to your manager, but you may also raise a concern to:

- another member of management;
- Human Resources;
- A member of the Legal team;
- **Compliance@employbridge.com**; or
- through the **[Employbridge Hotline](#)**.



Retaliation means any adverse action taken against a person who raises a concern or who participates in a Company investigation of misconduct. It can include shunning or harassing the person, making threats intended to intimidate them, or taking an employment action against them because of their report or participation in an investigation.



Good Faith means that to your knowledge, the information you are providing is complete, truthful, and accurate.



**Policy
Against
Retaliation**

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The Employbridge Hotline, available 24 hours a day, seven days a week, is hosted by a third-party provider so that you can make a report on a confidential and anonymous basis if you choose. Instructions for accessing the [Employbridge Hotline](#) can be found in the Key Contacts and Resources section of this Code.

We take all reported concerns very seriously and will follow up with an investigation as deemed necessary. Colleagues are required to cooperate with internal investigations whether they are conducted by the People Success Center, Company legal counsel, or external counsel acting on behalf of the Company. We must never alter any documents or electronic records, lie to or mislead an investigator, obstruct or in any way inhibit the collection of information relating to an investigation or any legal action brought against or on behalf of the Company. To the greatest extent possible, all information collected or learned during any Company investigation will be kept confidential and used only for the purpose of the investigation. There may be occasions when we are required to share information with others to conduct a thorough investigation or to respond to a government inquiry. In those cases, information will only be shared with those who have a legitimate need to know. Colleagues must not try to conduct their own investigation as such actions could compromise the integrity of the investigation process and adversely affect the Company and others.

Confirmed violations of the Code will result in disciplinary action up to and including termination of employment.

Q

I saw something at work that I am pretty sure violates our Code of Conduct, but I don't want to get involved. There are others who know about it, so I am sure someone else will report it. It's not my responsibility, right?

A

Wrong. We are each responsible for speaking up if we believe something violates the law, our Code or other Company policies. It might seem easier to look the other way or leave it to others if you suspect that someone has done something wrong, but this type of misconduct affects all of us. If you don't speak up, we won't be able to address the problem, which could eventually become a bigger problem for all of us. Remember, we will not tolerate retaliation against anyone who raises a concern in good faith or who participates in an investigation of possible misconduct.

Q

What if I suspect that someone may be violating the Code, but I can't be 100% sure. Should I wait to report it until I have all the evidence?

A

No, if you have a good faith concern you should speak up. It's better to raise a potential issue so the appropriate people can look into it and determine if there is a problem.

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Our People


Everyone belongs


We Value Our Differences

We believe that when diverse experiences, backgrounds, perspectives, and ideas come together it unlocks unlimited innovation and potential. We value our differences and embrace inclusion, recognizing that this is crucial to achieving our goals.

We are committed to providing equal employment opportunities, irrespective of race, color, national origin, gender, age, religion, sexual orientation, gender identity, gender expression, disability status, or any legally protected characteristic.

We work to ensure any use of artificial intelligence in employment decisions does not have an adverse impact against any person in a protected class.

We strive to create a culture free from discrimination where everyone is welcome. We embrace diversity, equity, and inclusion – so that everyone feels they belong and are empowered to perform at their very best and unlock their potential.

We value relationships above all else and we build strong relationships by treating each other with respect. We believe that we win as one when we encourage and support each other.

This means we will never engage in or tolerate harassment of any kind, especially if based on an individual's race, color, religion, sex, sex stereotyping, pregnancy, gender, gender identity, gender expression, national origin, age, mental or physical disability, ancestry, medical condition, marital status, military or veteran status, citizenship status, sexual orientation, genetic information, or any other legally-protected status or activity.

We build a bridge to better when we:

- are free from bias and value diversity as a strength;
- are inclusive and listen carefully to different points of view, making sure everyone is heard; and
- provide equal opportunities to all colleagues and prospective colleagues when making employment-related decisions.



I think a qualified person may have been denied a position because of their age. As I wasn't responsible for making the final hiring decision, should I just let it go?



No. You should raise your concerns so we can determine whether any discrimination took place in the hiring process. If discrimination did occur, it would violate our policy and the law.

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We Treat Each Other with Respect



We value relationships above all else and we build strong relationships by treating each other with respect. We believe that we *win as one* when we encourage and support each other.

This means we will never engage in or tolerate harassment of any kind, especially if based on an individual's race, color, religion, sex, sex stereotyping, pregnancy, gender, gender identity, gender expression, national origin, age, mental or physical disability, ancestry, medical condition, marital status, military or veteran status, citizenship status, sexual orientation, genetic information, or any other legally-protected status or activity.

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What is considered harassment?



Harassment is any unwelcome conduct that might reasonably be expected to cause offense or humiliation to another person or interfere with their ability to do their work. It may be verbal, physical, or visual. It may be non-sexual or sexual in nature. Some examples include:

- making slurs, inappropriate jokes, negative remarks, or stereotyping anyone;
- bullying, targeting or singling someone out for ridicule, exclusion, or other harmful treatment;
- displaying or sharing material that could be offensive to others;
- making unwanted romantic or sexual advances;
- abusing a position of power or authority to coerce sexual contact;
- conditioning a promotion, raise or other working condition on participating in sexual or romantic activities; and
- inappropriate touching of others.

This type of behavior has no place in our Company. If you ever see or experience behavior that violates our commitment to treat each other with respect, report it to your manager, Human Resources, the Legal Department or through the Employbridge Hotline.



Policy Against Sexual Harassment and Other Workplace Harassment

We Maintain a Safe and Healthy Workplace

Our focus on wellness is reflected in our shared commitment to maintain a safe and healthy workplace where we are each able to unlock our full potential. This includes maintaining a workplace that is free of environmental or safety hazards, alcohol or substance abuse, threats or acts of violence and weapons of any kind.

We are each responsible to:

- comply with all environmental, health and safety laws, policies and procedures that apply to our work;
- use good judgment and never work while under the influence of alcohol, cannabis, illegal drugs, or over-the-counter or prescription drugs that affect our ability to work safely; and
- speak up if we see potentially unsafe conditions or behaviors that could pose a risk to the health or safety of our colleagues, talent, or stakeholders.

Q I know our policy says we cannot work under the influence of alcohol, but does that include business dinners with clients or other Company events where alcohol may be served?

A There are occasions when responsible alcohol consumption may be acceptable such as at a Company-related event or when entertaining clients. In those instances, only legal, moderate consumption of alcohol is acceptable. You must never drink to excess, and we must take appropriate measures to ensure everyone in our group gets home safely.

Q My colleague made a comment about how he'd like to hurt his manager after being assigned more work. When I questioned him about it, he said he was just joking but I thought he seemed really angry. Should I ignore this?

A No, you shouldn't ignore this as threats of violence are never okay. Even though he might be joking, comments like this could escalate into something more serious. Contact your Human Resources representative for guidance or report the incident through the Employbridge Hotline.



**Workplace
Violence
Policy**

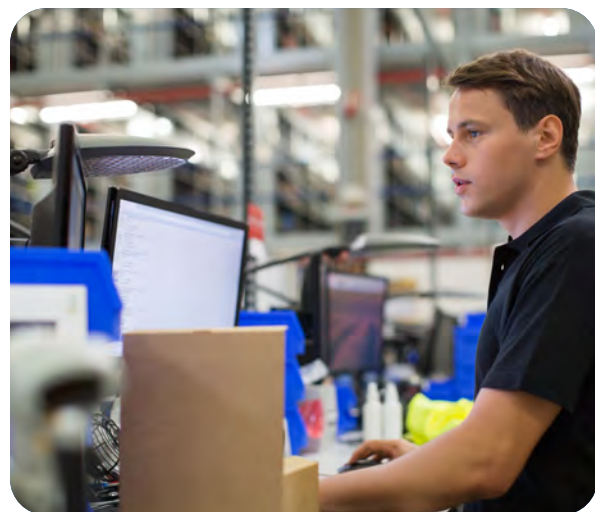
We Protect Each Other's Privacy

Our colleagues and talent provide us with personal information so that we may carry out necessary business activities. We must protect the personal information entrusted to us by complying with applicable privacy and data protection laws where we do business.

If we handle personal information as part of our job responsibilities, we must ensure that we:

- collect, hold, and use only the personal data we need for legitimate business purposes;
- are transparent with others about the type of information we collect;
- take appropriate measures to protect that information from potential loss, misuse or disclosure while it is in our custody;
- share it only with those who have a legitimate "need to know" or when required by law; and
- immediately report any possible misuse or compromise of personal data to the Legal Department, Privacy@employbridge.com, or through the [Employbridge Hotline](#).

Personal information or data includes any information that can reasonably be used to identify, contact, or locate an individual directly or indirectly. Some examples include telephone numbers, email addresses, banking or financial information, government identification numbers, health information, biometrics, race, and ethnicity among other things.



Privacy Policy
Handling PII Policy

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We're blazing a new path forward

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We Comply with Our Client's Policies

We know that putting *relationships first* makes us better and our relationships with our clients are of the utmost importance to us. To keep our promise to deliver a high-quality workforce, we must be trusted to comply with the rules and policies of our clients when we are working on their site or on assignment to them. If a client policy or rule creates an unsafe working condition or violates the law, we will immediately report this to Employbridge management so that it can be addressed appropriately.



What type of client policies might we be required to follow?



Client policies may include requirements for reporting absences or tardiness, restrictions on use of personal phones, personal use of internet, and guidelines on dress code and conduct. Respecting our client's policies when working directly with them shows our commitment to putting those relationships first.



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Colleague and AIB Handbook



We Communicate with Care

Effective collaboration is an important component of our value to *see further* and is a key to our success. We collaborate by communicating with others through a variety of methods such as voicemails, emails, instant messages and text messages. We must take care to ensure our communications are always honest, factual, professional, and respectful. Keep in mind, any message could become public and have a positive or negative impact on ourselves or our Company.

Social media can also be a valuable tool for communicating with others. It can be used by designated spokespersons to share news about our Company. Many of us use social media to share our personal thoughts and experiences. If we choose to communicate on social media for personal purposes, we must do so responsibly so as not to have a negative impact on ourselves, our colleagues, or our Company. Unless we have been authorized to communicate on behalf of the Company, we cannot do so – either on social media or elsewhere.

On occasion, we may get requests for information from people outside our Company. To ensure the information they receive is accurate, only individuals who have been designated as spokespersons may speak on behalf of the Company. If you receive a request for information from someone outside the Company, refer them to media.relations@employbridge.com.

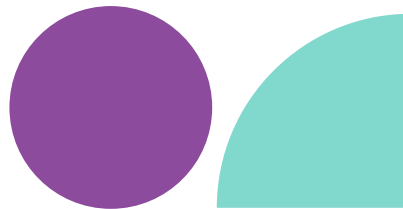


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Guidelines for Responsible Social Media Use

- **Follow the Code** – The Code and the Company’s policies apply to our online conduct as well as our offline behavior.
- **Protect Confidential Information** – Do not disclose confidential or private information about our Company, colleagues, talent, clients or business partners.
- **Refrain from Inappropriate Posts** – Do not post anything that violates our Code or Company policies, is false, or could be considered discriminatory, harassing, or offensive.
- **Be Clear Who You Represent** – Do not represent yourself as a spokesperson for our Company unless you are authorized to do so. When using social media for personal purposes, make it clear that you are expressing your own opinions and do not represent our Company.

If you have questions, talk to your manager, Human Resources, or send an email to Socialmedia@Employbridge.com.



Technology Acceptable Use Policy

Social Media Use in the Colleague and Associates in Branch Handbook



Many of the clients I work with use social media applications to communicate about their business. Can I follow them on my personal social media account and send updates related to our business with them?



No, you may not use personal social media accounts or personal email accounts to conduct Company business with clients. If you would like to find an appropriate way to engage with this client, send an email to Socialmedia@Employbridge.com and ask for guidance.



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We Avoid Conflicts of Interest

To achieve our goals, we work together in the Company's best interests and avoid situations that may divide our loyalties and create an actual or apparent conflict of interest. A conflict of interest exists when we let our personal interests (or those of our immediate family or romantic partners) interfere with our ability to make objective business decisions on behalf of the Company.

Conflicts of interest are not always clear. Some examples include:

- working for, or having a significant financial interest in, a competitor or someone who does business with Employbridge;
- having a second job that interferes with our work at Employbridge, or using Company assets for personal gain;
- having a family or close personal relationship with someone who reports to us or to whom we report;
- making selection decisions about a prospective colleague, supplier or other business partner when the applicant is a family member or friend;
- accepting money or any benefit (other than a nominal promotional item or customary business gift or entertainment) from a supplier or anyone who does business or seeks to do business with Employbridge; and
- competing with the Company or taking personal advantage of business opportunities that should be available to Employbridge.

It is not possible to list every situation that could create a conflict of interest so it is important that we recognize anything that may impair our objectivity or cause us to act in a way that puts our personal interests ahead of the Company. We must disclose any potential conflict of interest to our manager, Human Resources or the Legal Department. It is always best to be transparent as most conflicts of interest can either be avoided entirely or resolved easily if they are properly disclosed.

For these purposes, a **family member** is considered to be a spouse, parent, child, sibling, in-law, domestic partner, or other individual with whom you have a romantic relationship.

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Q I am considering starting my own side business to make extra money. Is that okay?

A Having a second job may be acceptable if:

- it does not interfere with your job performance or responsibilities at Employbridge;
- you do not use your position at Employbridge or its resources for any purpose;
- you do not work for a third party that does business with Employbridge; and
- you do not compete with Employbridge.

You should be honest and transparent and discuss it in advance with your manager and the Legal Department to be sure it complies with Company policy and won't create a conflict of interest.

We Exchange Gifts & Hospitality Responsibly

When done responsibly, exchanging modest gifts and sharing meals or other hospitality can be a way of building relationships and goodwill with our clients and business partners. We must always be careful to remain independent and objective in our business dealings and we must never exchange gifts or hospitality in exchange for a favor or to improperly influence a business decision.

Extra caution must be taken when interacting with government officials. Because of this, we never offer gifts or hospitality of any kind to a government official without advance approval from the Legal Department.

Gifts and hospitality that are generally acceptable are:

- ✔️ modest in value and will not create, or appear to create, a conflict of interest
- ✔️ given and received openly and transparently
- ✔️ infrequent and consistent with good business practices
- ✔️ not solicited

Gifts and hospitality that are not acceptable are:

- ❌ cash, a gift card or other cash equivalent
- ❌ loans or discounts from suppliers or business partners that are not offered to the general public
- ❌ offered or accepted during active negotiations
- ❌ intended to improperly influence a business decision or offered in exchange for a favor
- ❌ illegal or against company policy for either party

Individual gifts or series of gifts from the same supplier or business partner totaling \$200 USD or more in a given year should be reported promptly to Compliance@Employbridge.com



Gifts & Entertainment Policy

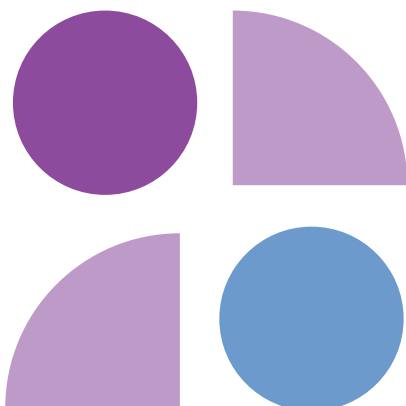
We Do Not Engage in Bribery or Corruption

We promote transparency, and we comply with the laws and regulations that prohibit bribery and corruption wherever we do business. These laws, such as the U.S. Foreign Corrupt Practices Act, prohibit us or a third party working on our behalf from offering anything of value to a government official or a commercial partner to obtain or retain business, or to improperly influence a business or government decision.

If you are ever asked to make or to accept a bribe, facilitation payment, kickback, or other improper payment, refuse the request and immediately inform the Legal Department at Compliance@Employbridge.com or through the Employbridge Hotline.

A **bribe** is defined as anything of value given or offered with the intent to influence the recipient to act in a person or entity's favor. Bribes can be monetary payments, such as cash or cash equivalents, kickbacks, excessive commissions, as well as other things of value such as gifts, excessive travel, and entertainment, offers of employment, or any form of preferential treatment.

A **kickback** is a form of bribery in which a payment is given in exchange for services rendered such as awarding a business contract.



Anti-Corruption Policy

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We Compete Fairly

We will succeed by being *better, always*. We compete fairly based on the quality of our services and we do not engage in illegal or unethical business practices.

We comply with the laws and regulations that promote fair competition in the states and countries in which we operate. These laws, called antitrust or competition laws, prohibit conduct that may restrict competition such as agreements among competitors to:

- fix or set prices;
- coordinate bids or agree on bid terms;
- boycott suppliers or customers;
- allocate markets, territories or customers;
- limit the production or sales of products or services; or
- make any other agreement that may unlawfully restrict competition.

We must never engage in discussions with competitors about the topics above or any other competitively sensitive information. Competitive intelligence may only be obtained from publicly available sources such as public presentations and marketing documents, advertisements, and other published information. We must never take unfair advantage of anyone through manipulation, abuse of privileged or confidential information, misrepresentation of material facts, or any unfair dealing practice.



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We differentiate ourselves through our expertise and innovative approach to helping clients build a better workforce. We are truthful in our sales and marketing practices and never say anything false, disparaging, or misleading about our competitors or their products or services.

Antitrust and competition laws vary by country and are complex, so seek guidance from the Legal Department if you have any questions.

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I was invited to a trade association event that some of our competitors attend. I think it would be a good opportunity to learn more about what's going on in the industry. Can I attend?



Trade associations and other industry bodies can be useful groups to help businesses grow, develop best practices and foster their mutual interests, but they also present competition law risks. If a participant at the event raises an improper topic such as prices, pricing policies, costs, discounts, credit terms, restrictions on buying or selling, or suggests any form of collusion, explicitly state that you will not discuss the matter, leave the meeting and have both your objection and exit noted. Then report the incident to the Legal Department as soon as possible.



I made a sales call on a prospective client and afterward the client emailed me a document with pricing from one of our competitors. I didn't ask for it and I don't think I should have it. What should I do?



It would be unethical to use the information even though you did not ask for it. In a situation like this where you inadvertently obtain another company's confidential and competitively sensitive information, you should immediately contact the Legal Department for guidance as even the appearance of anti-competitive behavior can be a problem.

We Maintain Accurate Books and Records

We maintain complete, accurate and timely books and records that help us make good business decisions, ensure the integrity of our financial reporting and comply with the law. We have established policies and internal control procedures that must be followed to safeguard our Company's assets and to ensure our books and records can be relied upon. Intentionally misrepresenting or falsifying information in our books and records is a form of fraud and is against the law and Company policy.

We are each responsible for:

- maintaining complete, accurate and timely books and records related to our areas of responsibility;
- retaining and destroying records in accordance with our Records Management Policy;
- following all internal control procedures and applicable accounting policies;
- cooperating with internal or external auditors, investigators, or regulators; and
- reporting any actual or suspected error or irregularity in the records or violation of internal controls to the Legal Department or by using the Employbridge Hotline.

Q If I don't work in Finance or Accounting, do I need to be concerned about the accuracy of our books and records?

A Yes. In addition to our financial statements, a record can be anything that documents a business activity, decision, or transaction such as contracts, invoices, timecards, and expense reports. We each have a duty to make sure that the information we provide in all Company records is clear, complete, accurate, and timely.

Q My predecessor left behind several old documents and emails that have passed their retention period according to the Company's retention schedule. Is it okay for me to destroy them?

A Maybe. You are right that we must follow the records retention schedule; however, sometimes records may need to be held longer if they are relevant to an investigation, legal matter or dispute. Records that are subject to such a legal hold cannot be destroyed until the legal hold is properly released, even if the normal retention period has expired. If you are unsure whether these records are subject to a legal hold, you should check with the Legal Department before taking any action.

Q One of my colleagues has committed to spending \$50,000 with a supplier for services in the next year. As this amount is greater than his spending authority, he asked me to create two purchase orders instead of one so he could avoid asking for higher approval. Is that okay?

A No, this action would violate important internal controls that are in place to ensure all transactions are properly authorized. You should explain this to your colleague and discuss it with your manager to be sure it doesn't happen again.

We Protect the Assets of Our Company, Business Partners and Clients

Each of us has a duty to use Company assets for business purposes only and not for personal gain. We are responsible to protect those assets from loss, damage, theft, waste, or misuse. This includes assets such as equipment, supplies, facilities, and funds, as well as our confidential and proprietary information.

Our confidential and proprietary information includes our intellectual property (patents, trademarks, trade secrets, copyrights), employee data, customer lists (both prospective and current), strategic plans, marketing and/or service plans, salary information and any unpublished financial data among other things. We should properly store all confidential information in a safe and secure place, use it only for authorized business purposes, and never share it with people outside the company.

Through our work, we may have access to confidential or proprietary information about a client or business partner. In that case, we must follow the same guidelines to keep it confidential and must always respect the intellectual property rights of others, using it only with express permission and as instructed by the intellectual property owner.



How will I know if the information I am working with is confidential or proprietary?



Usually such information is marked internal, confidential, or proprietary. If it isn't, ask yourself these questions:

- Is this information unknown outside the Company?
- Does it belong to one of our clients, suppliers, or other business partners?
- Would the Company, or an individual, be disadvantaged or possibly harmed if others had the information?

If the answer to any of these questions is yes, the information should be treated as confidential and properly protected. Remember, our obligation to protect confidential information continues even after we leave the Company.



**Technology
Acceptable Use
Policy**

We Use Technology Responsibly

We live in a world of rapidly changing technology that enables us to work even more efficiently and effectively, but these changes also bring about new challenges. We are committed to the responsible and ethical use of evolving technology, including Artificial Intelligence, in our business practices; and to meeting the huge challenge of protecting the information, software, hardware, and networks that enable us to do our work.

Protecting information about our Company, business partners and clients that is held on our computer systems, portable electronic devices, laptops, phones, and other technology requires us to take appropriate security measures to prevent loss or misuse due to unauthorized access.

These measures include:

- installing only authorized software and applying software updates as necessary;
- keeping our devices secure and avoiding the use of public Wi-Fi;
- using unique, strong confidential passwords; and
- being alert for phishing scams or other potential cyberattacks.

It is important that we complete all required Information Security training so that we understand the risks and how best to manage them.

To further ensure the security of our information systems, we take steps to monitor activity by anyone who accesses the Company's network or systems using any device, regardless of ownership, to conduct Company business. There should be no expectation of privacy when working on Company premises, using Company equipment or accessing Company networks or systems.



I was on vacation and a colleague needed me to send them a file I had been working on to meet a deadline. I didn't have my Company laptop with me, but I could use my personal laptop and the hotel Wi-Fi to access the file and send it to them. Would that be okay?



No. We should only use approved, secured means to access or transmit company files or data. Using unsecured devices or internet services could expose the Company to viruses or unauthorized access.



Technology Acceptable Use Policy

Use of Generative AI and best practices document

We Do Not Trade on Inside Information

As part of our business activities, we may become aware of non-public information about our Company, another company that does business with us, or a competitor. Information is considered non-public if it has not been disclosed to the public with adequate time or opportunity for the market to digest the information. This type of information is often referred to as inside information. We must keep this information confidential until it is made public, and we may not trade in securities, or suggest others do so, based on material inside information.

Information is deemed **material** if an ordinary investor would consider it important in deciding whether to buy, sell or hold a security. Examples of information that may be material include:

- financial results or forecasts
- possible mergers, acquisitions, divestitures or investments
- obtaining or losing important contracts
- changes in senior management
- significant business developments such as new products or services
- litigation or regulatory developments



One of our clients is planning a large expansion at a particular plant. We are helping with workforce planning before the news becomes public. One of my colleagues suggested we should buy stock in the company since the news should be positively received in the market. Is that okay?



No. The news about the expansion has not been made public and it could be viewed as material to the company. We cannot trade in stock based on inside information such as this and we cannot suggest or give a “tip” to someone else who may trade based on the inside information.



Insider Trading Policy

We Expect Our Business Partners to Meet Our Standards

We are committed to the highest standards of ethics and integrity when conducting business and we expect our suppliers, and anyone acting on our Company's behalf, to meet those standards.

We will not knowingly conduct business with people or entities that are subject to U.S. Government trade sanctions, or anyone involved in illegal activities such as bribery, fraud, terrorist financing or money-laundering.

We are each responsible for ensuring we select suppliers and business partners alike, who are committed to high ethical business practices and raise a concern if we believe they are not meeting our expectations.

We expect our suppliers to:

- ✔ follow all laws that govern their business
- ✔ have effective safety, health and environmental programs
- ✔ provide clean and safe working conditions, forbid child labor, human trafficking and all forms of slavery
- ✔ ensure their employees receive all compensation and benefits required by law
- ✔ maintain anti-harassment and anti-discrimination policies
- ✔ maintain financial integrity through compliance with generally accepted accounting principles and effective internal controls
- ✔ prohibit conflicts of interest and ensure the prudent use of gifts and entertainment



Supplier Social Responsibility Policy
Trade Sanctions Policy

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*Unlocking success
through social
responsibility*



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We Support Human Rights

We support human rights, and we are committed to the principles set forth by the United Nations Declaration of Human Rights and the International Labor Organization.

We *champion all people* when we:

- promote a safe, healthy and inclusive work environment free from discrimination and harassment;
- comply with all applicable wage and hour laws;
- respect the right to freedom of association and collective bargaining;
- prohibit child labor, human trafficking and all forms of modern slavery; and
- expect our business partners to share our commitment to support these human rights.



Child Labor Policy

Modern Slavery (Anti-Slavery and Human Trafficking) Policy



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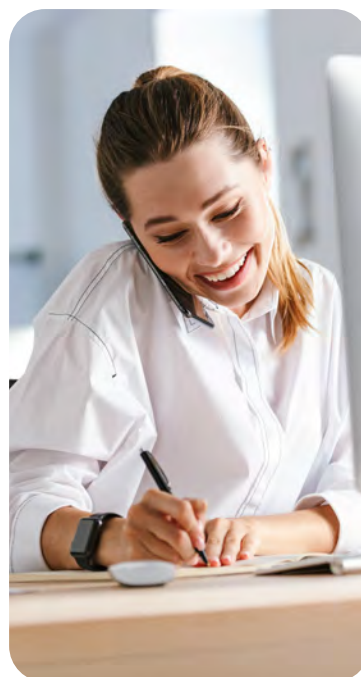
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We Respect the Environment

Being *better, always* also applies to our commitment to respect and protect the environment. In addition to complying with applicable laws and regulations, we strive to always *see further* when it comes to our planet by being good stewards and working to continuously improve in our efforts to reduce our Company's impact on the environment by better managing our resources, reducing waste and using energy more efficiently.



How can I help in our efforts to reduce our Company's impact on the environment?



We should continue to strive to look for everyday ways to be good stewards of the environment by looking for opportunities to:

- conserve water and other natural resources;
- reduce waste and recycle;
- use energy and resources more efficiently; and
- encourage environmentally sustainable behavior by our colleagues, clients, suppliers, and other business partners.

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We are Active in Our Communities

We build a bridge to better opportunities and outcomes for our communities by working alongside national and local non-profit organizations whose values align with ours. We do this by making charitable contributions, providing our colleagues with Community Care time off and sponsoring volunteer efforts in support of civic, community, or other public projects that improve the quality of life in the communities where we do business.

As an organization, we do not make political donations or otherwise participate in the political process unless permitted by law and authorized in writing by the Chief Legal Officer or their designee.

We do encourage our colleagues to personally support charitable causes (in addition to their two days of Community Care time off) or to engage in political activities of their choosing as long as they:

- do it on their own time, with their own funds and are clear that they are acting as individuals and do not represent the Company;
- do not use Company resources, including funds, time, property, equipment, or personnel for these personal activities; and
- do not pressure or influence other colleagues to support any candidate or cause, or to make a personal charitable or political contribution.

We're passionate about contributing to the collective success of our communities by building meaningful connections and serving as a bridge to better: better outcomes, better futures, and a better world.

Q I am active in a local charity whose mission, I believe, is aligned with our purpose and values. I would like to help sponsor their upcoming fundraising gala by making a small donation on behalf of the Company. If I have the money in my budget, can I do that?

A Maybe. We cannot donate to a charitable cause on behalf of the Company without approval of the Chief Legal Officer. If you think the sponsorship is something that would be good for the Company, you should contact the Legal Department for guidance.



Charitable Contributions Policy

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The background of the entire page is a dense, vertical stack of intermodal containers. The containers are in various colors, including shades of blue, teal, red, and white. The perspective is from a slightly elevated angle, looking down into the stacks, which creates a sense of depth and repetition. The lighting is even, highlighting the metallic texture and the locking mechanisms on the doors of the containers.

Key Contacts and Resources

Key Contacts and Resources

Key Contacts and Resources

Resources

More detailed information on topics covered under the Code of Conduct can be found in Company policies located on thEBridge.

If you have any questions about our Code of Conduct, you may contact your supervisor or the Legal Department for guidance. For any interpretation of law, you should contact the Company's Legal Department, which has the ultimate responsibility for the resolution of such issues.

Contact Information

- Legal Department: Legal@Employbridge.com
- Compliance: Compliance@Employbridge.com

The Employbridge Hotline

The Employbridge Hotline is hosted by a third-party provider, EthicsPoint, and can be used to raise concerns in a confidential and anonymous manner. You may access the Hotline in the following ways:

- Toll-free telephone number: **(833)254-4056**
- Online: employbridge.ethicspoint.com
- Mobile: employbridgemobile.ethicspoint.com
- Use a smartphone to scan this QR code:



Administration

Administering the Code of Conduct

Our Company may modify the Code of Conduct from time to time as necessary to respond to changing laws, regulations, and Company policies. Any changes to the Code will be approved by the Board of Directors (the “Board”). The Board and the Chief Legal Officer or their designee will oversee compliance with the Code and will administer the compliance program.

Revisions to the Code will be applied prospectively from their effective date, however, previous conduct that is illegal, unethical or against any existing Company policy shall not be excused because the Code or any revision is not being applied retroactively. The Code is not an employment contract between the Company and any employee. No employee should interpret the Code as a contract for any purpose, including any promise of continued employment.

Waivers of the Code

Waivers of the Code are extremely rare and must be approved in writing by the Chief Legal Officer or their designee. Waivers will be granted only upon the full disclosure of all relevant facts. The fact that a waiver is granted in any particular case shall not create an implication or presumption that a waiver will be granted in any other case, even if it is similar, and a waiver may not be relied upon by any person, other than the person to whom the waiver was granted.

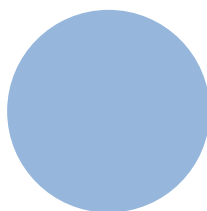


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