

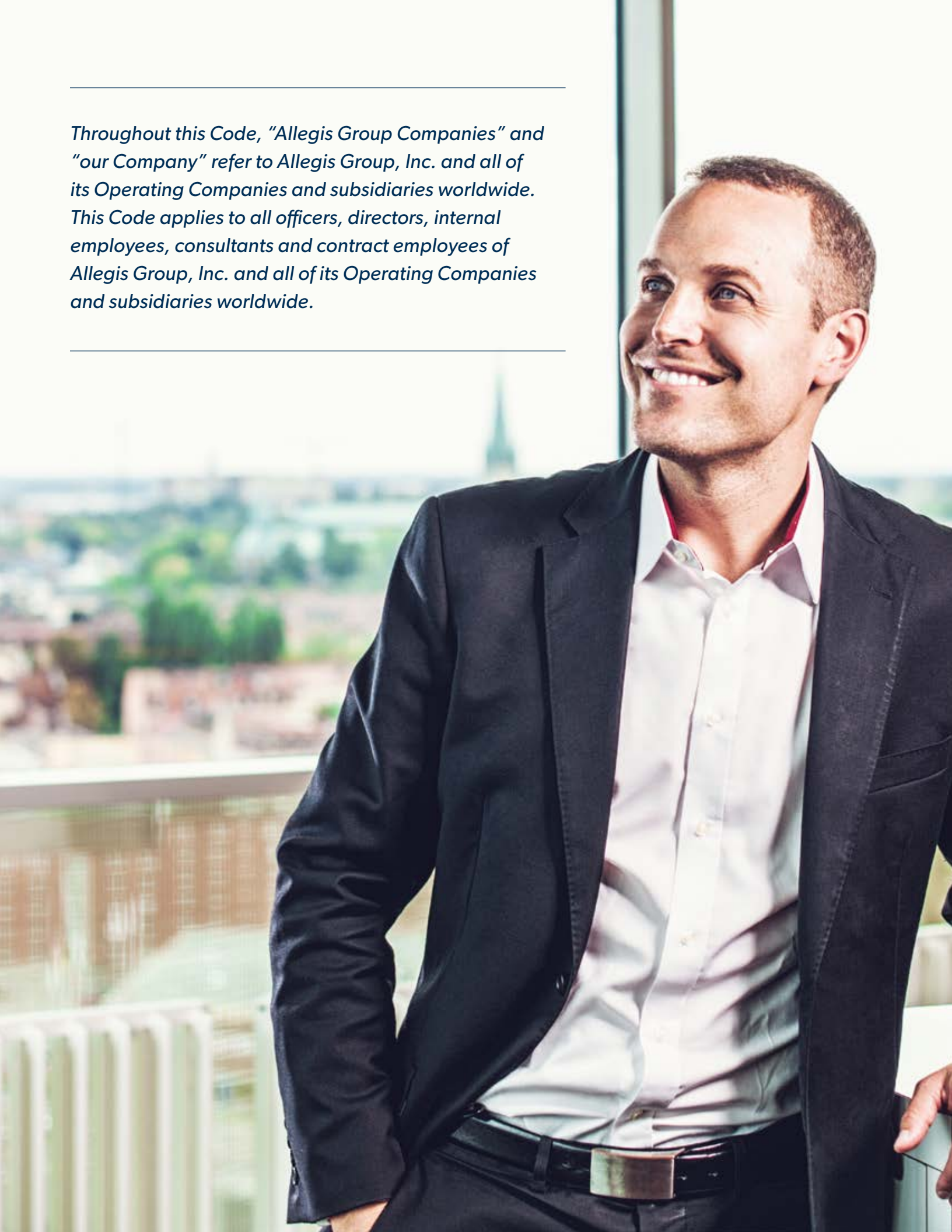


# THE ALLEGIS GROUP COMPANIES **GLOBAL CODE OF CONDUCT**

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*Throughout this Code, “Allegis Group Companies” and “our Company” refer to Allegis Group, Inc. and all of its Operating Companies and subsidiaries worldwide. This Code applies to all officers, directors, internal employees, consultants and contract employees of Allegis Group, Inc. and all of its Operating Companies and subsidiaries worldwide.*

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# Letter from Our President

Team Allegis Group,

Since our company was founded in 1983, Allegis Group's network of specialized companies continues to be an organization of employees who are driven to succeed and motivated by a strong desire to serve others. We partner with organizations across the globe to optimize talent attraction and retention while simultaneously providing individuals with significant opportunities to realize their professional aspirations and achieve personal success. We constantly partner with our colleagues to further the overall objectives of the organization, and we embrace opportunities to give back to the communities where we live and work.

Because we serve thousands of communities, customers, employees, and each other, we are providing this Code of Conduct as a resource that describes and reinforces who we are and how we conduct ourselves at all times in every part of the world. Our Code is designed to remind us all of our commitment to our Company's stakeholders. It also should remind us that there are fundamental core values that bind our Operating Companies together. We may use slightly different language to describe these values, but at their core, they are consistent across the entire organization, and they are the foundation of who we are.

We believe that providing people with jobs is a noble profession and is critical to any economy. The work we do is important, fulfilling, and meaningful to the lives and communities of so many. More important is how we carry out that mission every day.

When we first formed our organization, we talked about "Character Over Competence." While that saying has become less prevalent over the years, the fundamental meaning behind it remains the same. Competence is important. There is no question about that. But equally important is our character. What kind of people do we hire? What kind of organization are we? How do we conduct our business and ourselves?

Every day, we decide how we will conduct business. What we decide ultimately drives growth, success and progress in ourselves, our customers, our consultants, our contract employees, and our organization. How we decide to act drives perception of who we are and what type of company we are building — now and for the future.

Who we are is evident in the core values we have embraced since our very beginning. We believe in developing strong relationships to build trust. We believe in demonstrating relentless competitive spirit. We believe in serving others. And, above all, we believe in bringing in good people of high character. We pride ourselves on treating people fairly, with respect and truly caring about each other and everyone we serve.

I hope that you will find our updated global Code to be common sense and inherent to the way you conduct business and yourself on a daily basis. The Code is intended to be a practical, user-friendly guide, including helpful examples, to ensure our actions constantly reflect our core values. We are each responsible for reading through it, understanding it, and participating fully in the associated training. The Code and related training are important and should reinforce our pride in working at an organization that embraces honesty, integrity, respect, and ethical behavior in everything we do.

Thank you for everything you do to make our organization, our fellow employees, and our customers successful. Thank you for the way you carry yourselves and our brand. More importantly, thank you for all you do to continue to enhance our company's reputation.

Andy Hilger





## Our Company & Culture

### Today's Success

Today, Allegis Group represents a thriving network of specialized companies all fiercely committed to our mission — to provide organizations with the highest-quality talent solutions, while also creating significant opportunities for individuals to realize their professional aspirations and achieve personal success.

#### Network of Companies:

**Aerotek:** Staffing and workforce management solutions, connecting light industrial and skilled trades talent with clients in the manufacturing, logistics and construction industries.

**TEKsystems:** IT staffing solutions, IT talent management expertise, as well as managed project-based, and outsourced IT services via TEKsystems Global Services.

**Aston Carter:** Staffing and solutions for a range of professional focus areas, including accounting and finance; governance, risk and compliance; operations and administrative; and customer support.

**Allegis Global Solutions:** Our people support every part of the people business, with solutions ranging from permanent hires to contingency workforce management, from talent advisory to innovative technology, and beyond. We make the world of work work better.

**Major, Lindsey & Africa:** The largest and most experienced legal search firm offering a range of specialized legal recruiting and talent management

services to meet the ever-changing needs of law firms and corporate legal departments.

**Allegis Partners:** Global executive search firm focused on identifying diverse, top talent for human resources, board, CEO, and other executive and senior management roles across industries.

**MarketSource:** The proven alternative to traditional outsourced sales, providing customized sales solutions and capabilities for retail (B2C) and commercial (B2B) customers.

**Actalent:** Supports critical engineering and sciences initiatives that advance how companies serve the world. Our specialized expertise drives scale, innovation, and speed to market through a range of flexible solutions.

**The Stamford Group:** Recruitment, consultancy, project management and HR services in EMEA for IT and life sciences through Stamford Consultants and Talentis.

**Getting Hired:** A recruitment solution dedicated to helping inclusive employers and advocacy organizations hire professional individuals and veterans with disabilities.

Collectively, Allegis Group employs more than 15,000 internal employees, including nearly 5,000 dedicated recruiters located in over 500 offices. Allegis Group has over 130,000 contract employees and consultants providing services on a daily basis at more than 18,000 clients across the globe.



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A man with a beard and short dark hair, wearing a blue V-neck sweater over a white collared shirt, is holding a tablet computer. He is looking upwards and to the right with a thoughtful expression. The background is a blurred, modern interior space with architectural lines.

# INTRODUCTION



# The Purpose of Our Code

Our global Code of Conduct (Code) is designed to provide guidance for conducting business according to the highest ethical standards and consistent with our shared values. Think of our Code as a guide that can help us make sound decisions in complex situations involving our Company and our business. When questions arise, we can refer to this Code and rely on our internal expertise to answer questions and confront issues together. In order to foster strong relationships and act with character, we must conduct all Company business in accordance with our Code, our internal policies and applicable laws and regulations. Our Code helps us to uphold our values by providing guidance and instruction on how to identify and promptly address ethical issues as they arise. Our Code also provides clear mechanisms for reporting unethical conduct without fear of retaliation or retribution.

Throughout this Code, there are references to global policies. Policies are additional resources to the guidance provided in this Code. In the event of any discrepancy between the information described in these summaries and the full policy, the policy will control. To view these policies, visit the company intranet (StriveNet) at <http://strive.allegisgroup.com>. If you are unable to access the company intranet, please consult with your HR representative.

## We All Follow Our Code

Our Code and all related Company policies apply to everyone at all levels of the organization, including but not limited to: Officers, Directors, Internal Employees, Contract Employees, our Independent Contractors (outside of the U.S.), Consultants and members of the Board of Directors. Additionally, we expect that our suppliers, vendors, sub-vendors, and business partners will follow these principles and adhere to the principles outlined in our Supplier Code of Conduct.

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**THROUGHOUT THIS CODE, THE TERM "EMPLOYEES" INCLUDES ALL INTERNAL EMPLOYEES AS WELL AS ALL CONTRACT EMPLOYEES, CONSULTANTS, INDEPENDENT CONTRACTORS (OUTSIDE OF THE U.S.) AND OTHER TEMPORARY WORKERS.**

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## The Code and the Laws

We are committed to acting within the laws and regulations in every community in which we operate. As a global company, the laws, and regulations of more than one country may apply to the work we do. Regardless of location, we must understand and abide by the laws and regulations that apply to the work we perform.

Since no single document can address every possible situation that could present an ethical issue, we must all use good judgment to decide the most appropriate way to conduct ourselves. If you find yourself in a situation in which you are unsure whether a decision or action is the most appropriate one, try to answer the following questions:

1. Is this the right thing to do?
2. Does it follow our Code, policies and applicable laws and regulations?
3. Am I being respectful, honest, and fair?
4. After my decision is made, how will others view my actions?
5. If my decision were reported in the media, how would I or our Company be perceived?



## **OUR RESPONSIBILITIES**



# Asking Questions and Reporting Concerns

This Code, along with our Company policies and applicable laws and regulations, forms the backbone of our responsibilities to each other, our customers, and other stakeholders.

A question or concern may arise that requires clarification, or you may be confronted with a situation of which our Company should be aware. Our Company values honesty, integrity, and respect, so we should always speak up to ask questions or report issues with appropriate urgency.

## Who to Contact

If you become aware of a situation that may violate our Code, Company policy or the law, you should report it to one of the contacts listed below. When we speak up to report perceived wrongdoing, it allows our Company to investigate potential problems, implement solutions and prevent future issues that could damage our reputation and harm others.

To make a report, you may contact any of the following resources:

- Your Supervisor, Manager or Department Leader
- A Human Resources Representative for your company
- The Legal Department
- The Corporate Ethics and Compliance Officer, by mail or email
  - By mail: 7320 Parkway Dr., Hanover, MD 21076
  - By email: [corporateethicsofficer@allegisgroup.com](mailto:corporateethicsofficer@allegisgroup.com)
- Our External Hotline
  - By Phone and Internet: +1-866-377-7489 (US Toll Free) – a list of country specific numbers can be found via the web: [www.allegis.ethicspoint.com](http://www.allegis.ethicspoint.com)
  - Via the Internet: [www.allegis.ethicspoint.com](http://www.allegis.ethicspoint.com)

When a report or inquiry is made, the Company will respond promptly and appropriately, and all reports and inquiries will be treated confidentially to the extent possible. If you do not feel comfortable speaking to one of the Company's internal resources listed above, you may always use our external hotline, which is operated by an independent third party. When you call the hotline, a specially trained representative will listen to your concerns, ask you a few questions and review the information with you to ensure it is accurate. If you wish, you may use the external hotline to report any matter anonymously, as permitted by applicable local law.

Our Company ensures that all investigations are conducted in a consistent, comprehensive, and confidential manner (to the extent possible) that complies with applicable laws. When an investigation is completed, the Company will take appropriate corrective or disciplinary action, in accordance with local laws and internal policies and procedures. In appropriate situations, you may be updated on the actions taken to resolve your report.



## Our Commitment to Non-Retaliation

We believe that building relationships based upon trust is a valuable way to strengthen our Company. One way we show this is through our strong commitment to non-retaliation. An employee will not be subject to an adverse employment action for reporting, in good faith, a suspected violation of our Code, Company policy or the law, or participating in an investigation. Acting in “good faith” means that you come forward with all relevant information, without malice or ill intent, and that you believe you are giving a sincere, complete, and accurate report.

Anyone who does take, attempts to engage in, retaliatory action will be subject to disciplinary action, up to and including termination.

## What We Expect of Our Leaders

We expect our leaders (Executives, Managers, Supervisors, and Leads) to provide guidance, direction, and leadership by demonstrating how to conduct business ethically and with good judgment. We expect leaders to foster environments in which we can build trust with each other, and we depend on our leaders to be an invaluable sounding board for our questions and concerns.

As a Leader, make sure you:

- Communicate and demonstrate the spirit of our Code to those who report to you.
- Take an active role in assuring that your direct reports and all members of your team(s) have the training they need to work ethically and effectively.
- Create an environment where your direct reports and all members of your team(s) feel comfortable asking questions and raising concerns.
- Respond quickly and effectively to concerns that are reported to you, and seek answers to questions you cannot answer yourself.
- Take prompt remedial action when mistakes or misconduct occur.

Leaders must make every effort to protect employees against retaliation and should be prepared to address or escalate issues through Human Resources, the Legal Department or Allegis Group’s Ethics, Compliance & Risk Management (ECRM) Team.



**OUR COMMITMENT  
TO EACH OTHER**



# Equal Opportunities, Inclusion and Diversity

We all share a passion to succeed that extends across all borders and characteristics. Our customers, business partners and colleagues all come from a wide variety of backgrounds and cultures, but because the strong relationships we build are based on trust and mutual respect, we will not allow our differences to divide us. Sharing a diversity of opinions and ideas helps us perform at our optimal level, meet, and exceed our customers' needs and in turn become a better, stronger company.

To this end, we each contribute daily to maintaining an inclusive work environment that fosters respect for all of our coworkers, customers, and business partners, and one that reflects the diversity of our communities. Our Company provides equal employment opportunities, meaning that we do not make employment-related decisions or discriminate against anyone on the basis of race, color, religion, sex, gender expression, gender identity, sexual orientation, national origin, age, disability, pregnancy, childbirth or related medical condition, citizenship status, military or veteran status, genetic information, union affiliation or any other characteristic protected by applicable law. This approach applies to every aspect of employment, including recruitment, selection, promotion, transfer, terminations, redundancies compensation, access to benefits and training and corrective action. For further information regarding our equal employment policies, you may also consult your Employee Handbook, or contact your Human Resources Representative or the Legal Department.

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## QUESTION AND ANSWER

**Q: Jennifer, an Account Manager for a National Account, has been asked by her customer to give all applicants an English language proficiency test and provide the results to the customer so that they can screen out certain applicants. What should Jennifer do?**

**A:** The customer's request could result in discrimination on the basis of national origin or other protected class. Jennifer should not use an English proficiency test to screen out applicants unless the test has been properly validated to ensure that it is relevant to the job, consistent with a legitimate job requirement, skill set or business necessity and does not disproportionately exclude people in a protected group. Jennifer should consult with her manager, a Human Resources Representative, or the Legal Department for advice.

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# Preventing Harassment

We make every effort to create a positive and productive work environment for our employees. To that end, we strive to maintain an environment in which every individual is treated with dignity and respect. This means we must not engage in behavior which could be viewed or perceived as harassing or hostile to our fellow employees. Such behavior includes disparaging or inappropriate remarks, gestures, or conduct relating to a person's:

- Race, color, ancestry or national origin
- Gender, gender expression or gender identity
- Genetic origin information
- Sexual orientation
- Religion
- Age
- Disability or medical condition
- Marital status
- Citizenship status
- Military or veteran status
- Pregnancy, childbirth or related medical condition
- Union affiliation
- Other characteristics protected by applicable law

Harassment can be sexual or non-sexual in nature. Sexual harassment includes conduct such as unwanted advances, inappropriate sexual jokes, sexually suggestive comments, inappropriate touching, requests for sexual favors and inappropriate comments about another's appearance. Non-sexual harassment may include offensive comments, jokes or pictures related to the above-listed topics. Use of the Company's network, system, or any electronic device (personal or company-issued) to harass another person is also strictly prohibited. (See also the Company Property section of this Code.)

Any harassing behavior we observe, or experience must be promptly reported to a Supervisor, Manager or Director, or another contact in this Code's "Who to Contact" instructions. For further information about preventing harassment, you may also consult your Employee Handbook, or contact your Human Resources Representative or the Legal Department.

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## QUESTION AND ANSWER

**Q: Kim is four months into a temporary assignment at a customer site, and she is increasingly uncomfortable with the behavior of a Customer Manager. The Customer Manager hangs around her desk, gets much too close for Kim's comfort, and frequently tries to talk her into going on a date. Kim has asked him to stop, but he just laughs and disregards her. She assumes that since he is an employee of the customer, her complaints would not be taken seriously and may jeopardize the duration of her assignment. What should she do?**

**A:** In accordance with this Code and the Employee Handbook, Kim should promptly report the behavior to our Company. The Company's No Harassment/No Discrimination Policy provides several reporting avenues Kim could utilize, strongly encouraging her to contact any of the resources in this Code's "Who to Contact" section. Any report of harassment will be handled seriously and as confidentially as feasible and allowed by law.

The Company is committed to providing and maintaining a harassment-free workplace for each of its employees and has a long-standing policy of ensuring an environment of dignity and respect for all.

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# Workplace Safety

## Health and safety

Each employee is an important part of our team, so our Company is committed to ensuring a safe working environment. We do our part by complying with all applicable health and safety rules and regulations as well as all posted safety procedures. Internal employees, consultants, and contract employees are also responsible for doing their part to comply with all applicable health and safety rules and regulations as well as all posted safety procedures. If you know of or suspect any unsafe situations or conditions at your worksite, you should immediately alert your Supervisor or Manager of the situation. Additionally, if you suffer any injuries or experience any accidents in the workplace, you must report that information to your Supervisor or Manager and the Company's Workers' Compensation Department. Employees should not be dissuaded from reporting injuries and claiming workers compensation.

## Substance abuse

Substance abuse limits our ability to work in a safe, effective, and productive manner. The Company is committed to creating a safe workplace free from drugs and alcohol. Our employees are not permitted to work while under the influence of alcohol, illegal drugs, or misused prescription/over-the-counter medications. For further information on the Company's approach to ensuring a drug and alcohol-free work environment, you may also consult your Employee Handbook or contact a Human Resources Representative.

## Violence and crisis management

As part of maintaining a positive, productive, and safe work environment, the Company does not tolerate violence in the workplace. Violence includes any threats, physical altercations, coercion, pushing or shoving, horseplay, intimidation, stalking, and threats of violence, whether face-to-face or via electronic media of any kind. Weapons of any kind are not allowed in buildings of the Company or its clients, and in accordance with applicable law. If you know of a situation in which workplace violence has happened or has been threatened or insinuated, you should immediately report your concerns to your Supervisor, Manager, or a Human Resources Representative. If you believe someone is in immediate danger, contact the local authorities before reporting internally.





# Privacy, Confidentiality and Information Security

## Protection of personal information

We treat compliance with our data protection obligations seriously, and our Company is committed to respecting and protecting the privacy of personal information. We achieve this by following our written policies and guidelines for the processing of personal information, which includes how we collect, store, use, share and disclose such personal information of our applicants and employees as well as personal information we receive from customers and vendors. When taking any of these actions, remember the importance our Company places in trust and honesty, and make sure you understand all applicable privacy and data protection laws. Some examples of the personal information that our Company maintains include:

- Name and other personal information such as gender, date and place of birth and marital status
- Contact information, such as postal address, telephone number, e-mail address and emergency contact names and their contact information
- Professional information such as employment application and/or resume/CV, past employment history, including prior employers, prior compensation and references, educational background, areas of expertise, academic and training related information, such as academic degrees, professional qualifications, certifications or trainings and security clearance information, and languages and other skills
- Social security or other government issued identification information, including driver's license information.
- Information and documentation required under immigration laws such as passports, work permits, citizenship, and residency information
- Medical information

We must also take care to share such information only with those who have a business need to know it.

For more information on how we comply with our data protection obligations, please see our Company's Personal Data Protection Policy (available on the company intranet, StriveNet) previously known as the Employee Privacy Policy, which includes our Global Privacy Principles (which describe the standards that our Company applies to protect personal information). This Policy requires employees to ensure that the personal information they collect and use is handled in accordance with applicable data protection laws. If you have any concerns regarding our compliance with data protection obligations, then in addition to the options for "Who to Contact," you may also reach out to the Company's Global Privacy Office at [privacyofficer@allegisgroup.com](mailto:privacyofficer@allegisgroup.com).

## Compliance with labor and employment laws

Finding people meaningful employment — is a noble job, and we want everyone associated with our Company to be treated with fairness and decency. These values support our commitment to comply with all applicable labor and employment laws, including, but not limited to, those governing wages and hours. Our Company strives to ensure that all of our employees are compensated in a fair, accurate and lawful manner. It is our shared responsibility to ensure that all laws and regulations governing our business are carefully observed and any questions or concerns about these topics are properly addressed.

Labor and employment laws and rules can be complex, and if you should have any questions about their applicability, you should contact your supervisor, Human Resources Representative, or the Legal Department. Always remember that we must not retaliate against any fellow employee who asks questions or attempts to invoke his or her rights under applicable labor and employment laws and regulations.

We must also ensure that working conditions, both internally and at the worksites where we place contract employees, satisfy applicable legal standards, and reflect our values. Under no circumstances will any of our Companies hire individuals who are under the legal age for employment in the jurisdiction in which they will be working, or who are otherwise not legally eligible to work. Furthermore, we do not allow the exploitation of any employees, including the payment of wages below the applicable minimum wage, engagement in forced labor, or any other unsafe or unfair working conditions. It is our responsibility to become familiar with our customers' worksites so that we are able to spot these types of issues and report them to the appropriate party.

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### QUESTION AND ANSWER

**Q: Stephen, a recruiter, is working with a client who has requested that the Company contractually agree to perform criminal background and credit checks on employees working at the client's site. Should Stephen agree to do this?**

**A:** The fact that a client requires criminal and credit checks in a contract does not necessarily make the checks legally permissible. Stephen needs to check to be sure that these particular background and credit checks are permissible in the jurisdiction where the employees will be located. Several jurisdictions have passed laws that limit the ability to perform credit or criminal background checks. It is important that Stephen fully understands the work to be performed by the employee on the client site and then make sure the client's requests comply with applicable law. Stephen should consult the Legal Department or the Company's background check team in Human Resources if he needs assistance. Stephen should not agree to perform any type of credit or criminal background check on a candidate or current employee until he has confirmed that such a check is legally permissible.

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A woman with voluminous curly hair is smiling and looking off-camera to the right. She is wearing a light-colored blazer over a blue top and jeans. The background is a blurred office setting. A dark blue horizontal bar is positioned across the lower third of the image, containing white text.

**INTEGRITY FOR OUR COMPANY**



# Conflicts of Interest

One way we can demonstrate our good character is in how we handle situations in which our own personal interests conflict with the interests of the Company, our customers or business partners. These situations are called “conflicts of interest,” and could include but are not limited to the following:

- Owning a material financial interest (defined as greater than 1% of a company’s outstanding stock) in our Company’s competitors or an affiliate’s competitors
- Hiring a member of your family who would report to you.
- Engaging a family member or close friend to provide (external) services to the company.
- Accepting certain types of gifts from a Company vendor, sub vendor, supplier, customer or business partner.

These and other common conflicts of interest are explained in more detail in the following sections.

## Disclosure and resolution process

Regardless of the specifics, if a conflict or potential conflict arises, you must disclose it promptly to your Manager or Supervisor and seek to immediately resolve it. Your Manager or Supervisor will be responsible for determining an appropriate course of action and arriving at a decision after consulting with higher levels of leadership, if necessary.

All conflicts and appearances of conflicts must go through this disclosure and resolution process.

## Giving and accepting gifts and entertainment

Small gifts, business lunches or dinners, and other common, nominal courtesies can help to strengthen the relationships we maintain with our external and internal customers. Although such courtesies are an important tool for building relationships, we must also be forthright in our business relationships to ensure that they do not become conflicts of interest by improperly influencing any business decision. At risk is the possibility that what is intended to be a courtesy could become an obligation, or even a bribe. When you are determining whether a gift, meal or entertainment is reasonable, ask yourself the following questions:

- Do you regularly receive gifts or entertainment from this outside party, customer, vendor, sub-vendor, supplier, or partner?
  - Does the value of the gift, meal or entertainment exceed \$100?
  - Was the gift, meal or entertainment solicited?
  - In the case of a gift, does it include cash or cash equivalents (such as gift cards)?
  - Is the gift, meal or entertainment from an outside party or company that our Company does not have an existing business relationship with?
  - Does remittance and/or acceptance of the gift, meal or entertainment violate any applicable laws or regulations?
- If your answer to each of these questions is “no,” then the gift or entertainment is probably acceptable.

If your answer to each of these questions is “no,” then the gift or entertainment is probably acceptable.

If you answer “yes” to any of these questions, then you must contact the Corporate Ethics Officer ([corporateethicsofficer@allegisgroup.com](mailto:corporateethicsofficer@allegisgroup.com)) or the Legal Department for guidance. There may be limited circumstances in which refusing or returning a gift would be impractical or culturally insensitive.

When accepting or providing meals or entertainment, we must ensure that the purpose of the meal or entertainment is directly related to the business relationship between our Company and the other individual or organization involved. For example, if an existing vendor offers to take you to dinner or to a sporting event, it should be related to our mutual business relationship and the vendor's representative must be present.

The key thing to remember is that gifts, meals, and entertainment must never be allowed to influence, or even appear to influence, a business decision. The way we interact with our business partners shows others the type of Company we are, so it is important to always use our best judgment.

## Travel expenses

For all transactions be prepared to present itemized receipts for each charge and best practice is to submit your expense report on a monthly basis.

Situations in which one of our external business partners offers to pay for our travel expenses or asks for our Company to provide their travel expenses can potentially create a conflict. If you are unsure about whether you should provide or accept any travel-related expenses, please contact the Corporate Ethics Officer or the Legal Department. For information regarding Company reimbursement of travel expenses, please refer to the Travel & Entertainment Expense Reimbursement Policies and the International Travel Policy (available on the company intranet, StriveNet).

## Working with family and friends

In order to avoid the possibility of favoritism, we should never be in a position where individuals who have a personal relationship are also in a reporting relationship. Specifically, we may not work directly for, supervise, or make employment decisions about a family member. These personal relationships include your immediate family members (such as your spouse, children, stepchildren, parents, stepparents, siblings, in-laws, other members of your household, grandparents, aunts, uncles, and cousins) as well as romantic relationships.

If you have a family member or friend who is interested in employment with our Company and you would normally be involved in the hiring decision, you should disclose the situation to your Manager or Supervisor and remove yourself from the hiring process.

## Outside employment

We share a commitment to each other and our Company to properly carry out our duties to the best of our abilities. To this end, if you undertake any form of outside employment while working for us, such as running your own business, freelance work or a second job, you must ensure that these activities do not compromise the quality of your work for our Company. Also, remember that you should not use Company time or resources to perform outside work.

If you choose to undertake outside freelance, secondary employment or self-employment, remember that you may not work for any of our Company's competitors, vendors, sub-vendors, suppliers, or other business partners as this would be a conflict of interest. Nor should any outside employment, paid or not, ever imply sponsorship or endorsement by our Company or otherwise risk portraying our Company in a negative light. All employees must notify their supervisor or manager of any second job or outside work.



## Financial interest in other businesses

We must be careful about situations in which we may have a financial interest in a company that competes or does business with our Company. This applies if the financial interest is:

- Owned by you, your spouse, or any member of your immediate family.
- Direct or indirect (such as investing in a mutual fund or being the beneficiary of a trust).
- Due to being an investor, lender, employee, or other service provider of the other company.
- In one of our Company's competitors, customers, or suppliers, especially if you or employees who report to you are responsible for negotiating or managing the business relationship.

If you have a financial interest that fits this description, you must promptly report it to your supervisor or Legal Department for review and resolution of any potential conflict of interest. Furthermore, nothing in this Code is intended to prevent you from owning, as an investment, 1% or less of a publicly traded class of equity securities issued by any competitor, customer, or supplier.

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### QUESTION AND ANSWER

**Q: Talia, a Manager with the Company, has a brother who owns a significant financial interest in a business that Talia's sales team has decided to pursue as a potential new client. If her team wins the account, Talia will end up working with the new client regularly. Since Talia is not involved in the sales or decision-making processes, she figures her brother's financial connection to the business is not a big deal. Is she correct?**

**A:** No. Employees of the Company must promptly disclose any real or potential conflicts of interest. Talia should contact her Supervisor or the Legal Department and disclose her brother's financial interest to ensure the potential conflict of interest is properly addressed, as well as ensuring compliance with all ethical standards and laws.

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## Company Property

We have a shared responsibility to protect the assets of our Company and make sure they are used properly. We must only use Company or client property or assets for legitimate business purposes.

### Physical property and facilities

Just as we are honest and respectful in our relationships with coworkers, customers, and other stakeholders, we are equally respectful when protecting our Company's physical assets. We must always protect our Company's physical assets, including but not limited to our facilities, equipment, computers, mobile devices, and funds from theft, misappropriation, and damage. We must only use Company assets for legitimate Company business purposes and never for prohibited conduct such as sending harassing or inappropriate messages, or to do unapproved work for an outside party. Please refer to the Acceptable Use of Electronic Resources Policy (available on the company intranet, StriveNet) previously known as the Acceptable Use Policy, for more information about the proper use of the Company's systems and electronic resources.

### Confidential and proprietary information

Our obligation to be honest and loyal to the Company and each other means safeguarding the Company's confidential and proprietary information. This includes any information that could be of use to competitors or could bring harm to our Company if disclosed to a third party, such as customer and pricing information or corporate strategies such as acquisitions. Such information should never be shared with outside parties unless we are legally obligated to disclose it, or the disclosure has been authorized by our Company and the information has been protected through an appropriate confidentiality agreement with the receiving party.

Additionally, we must not disclose such information to our fellow employees unless they have a business need to know it or are authorized to access it. Remember that our shared obligation to protect our Company's confidential information continues even after employment with the Company ends. For more information about the protection of Company information, please refer to the Company's Information Classification Policy (available on the company intranet, StriveNet).

If you discover or suspect that our confidential information is being used or disclosed without authorization, you should notify the Corporate Ethics Officer or the Legal Department of the situation immediately. We are responsible for recovering any Company confidential information when possible and preventing further unauthorized use or disclosure.



## Intellectual property

We must protect our Company's valuable intellectual property (IP), including any copyrights, patents, trademarks, service marks, trade secrets, design rights, logos, brands, know-how and other similar property. These properties are important business tools, and their use, treatment and safeguarding must be thoughtful. To the extent permitted by law, the rights to all intellectual property are assigned to our Company and are the property of our Company. This is true of any such materials we create on our Company's time and expense or within the scope of the duties we perform for our Company. Any works, inventions, or developments we create during the course of our employment should be promptly disclosed to the Company in order to obtain legal protection over them. Please contact the Legal Department if you have any questions regarding intellectual property.

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### QUESTION AND ANSWER

**Q: Trini manages the Company's process of collections and invoicing. She needs to leave work early for a personal appointment but plans to take her company-issued laptop home to complete her work that evening. As she's leaving the office, Trini realizes that she will not have time to take her Company laptop home before her appointment and thinks about leaving it in the back seat of her locked car while she's at her appointment.**

**A:** We have a duty to protect confidential information belonging to our clients and our Company, as well as our Company's systems and data. We must each take responsibility for protecting these assets and information from the risk of security violations or theft. First, Trini should be sure that she only stores permitted data on her company-issued laptop, including taking into account any restrictions that may be imposed by customer or other third party contracts regarding data permitted to be stored on mobile devices. Once Trini has considered such restrictions, then if possible, Trini's best option is to leave the laptop secured at her office and return later to retrieve it. If she needs to take it outside the office, she should make sure it is with her at all times in a secure location. For example, if she goes home, she should minimize the time that the laptop has to be in her vehicle. If Trini has no choice but to leave it in her vehicle, it should be hidden from view (i.e. locked in the trunk, not on a seat or on the vehicle floor) prior to reaching her destination, and the vehicle should be fully locked after she exits the vehicle.

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# Company Computer Systems and Electronics

## Appropriate use

Our Company gives us access to various electronic assets in order to do our work efficiently, effectively, and successfully. It is important to remember, though, that these assets are Company property, and should primarily be used to conduct Company business. This includes:

- Desktop, laptop and tablet computers
- Smart phones and mobile devices
- Email, internet access and network resources
- Software
- External drives such as flash drives
- Printers, copiers and fax machines

Although some personal use is permitted, we should never let personal matters interfere with our job duties. A few examples of acceptable personal use could include:

- Scheduling an appointment or repairman
- Taking a call from your child's school or day care
- Coordinating schedules with a family member
- Shopping online during your lunch hour
- Briefly checking a social media site

For further information about appropriate use of electronic resources please refer to Acceptable Use of Electronic Resources Policy (available on the company intranet, StriveNet).

## Safeguarding of information

We all have to take responsibility for keeping Company and client information secure. When using electronic resources such as Company laptops or desktops, always ensure these resources are secure and that access to the data contained within these resources is password protected or otherwise physically protected at all times. Please refer to the Information Security Policies Framework (available on the company intranet, StriveNet) for more information. If you believe an electronic resource has been compromised, stolen or misused, contact your supervisor, our IS Consolidated Service Desk (aka the Help Desk) or our Information Security Officer. Security incidents can also be reported through the Security Incident Reporting Process (SIRP), which can be located at [infosec.allegisgroup.com](https://infosec.allegisgroup.com).

## Social Media

Social media can be a powerful and creative tool when used responsibly for both personal and professional development. The Company works to ensure that our use of any social media is respectful, professional and promotes the Company and our core values. We may access social media using Company electronic resources, but the Company reserves the right to monitor, restrict and access any such use in accordance with applicable data protection laws. For further information regarding monitoring activities, please review the Company's Acceptable Use of Electronic Resources Policy (available on the company intranet, StriveNet).

In order to use social media responsibly, employees must maintain a respectful and professional demeanor, and should not speak as an agent or representative of the Company unless authorized in advance to do so. If you see or become aware of any negative post on Social Media that could potentially harm the reputation of the Company, you must immediately report it to the leaders of the Marketing/Communications Department who will work with other departments (e.g., HR, Legal) as necessary to determine appropriate next steps.

Many of the principles in this Code also apply to our use of social media. For example, we must be careful not to distribute confidential or proprietary Company information through social media, and we must not use social media to engage in inappropriate behavior of any kind. We should also ensure that our use of social media does not conflict with our responsibilities to the Company, or our ability to complete our regular work duties. If you have further questions about this topic, please consult the Social Media Policy (available on the company intranet, StriveNet), which is part of our Information Security Policies Framework.

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### QUESTION AND ANSWER

**Q: Katya is a Professional Recruiter and avid Facebook user. Many of the people she connects with on Facebook have clever things to say about their work and the people they work with based on their race or ethnicity and Katya tries to do the same, though she is careful never to identify anyone by name. Is it okay for her to talk about work on Facebook?**

**A:** Katya must be cautious that what she says on Facebook regarding her coworkers will not be deemed or perceived as discriminatory or harassing in nature. Above all, she must also take care to protect our Company's confidential information and respect the privacy of her coworkers and any prospective hires. Katya must also remain keenly aware of and follow our Social Media policy and guidelines at all times.

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A woman with short blonde hair, wearing a white cardigan over a dark top, is leaning over a desk in a modern office. She is holding a pen and appears to be writing or signing a document. The office has large windows and glass partitions, with bright lighting. A dark blue banner is overlaid at the bottom of the image.

**RESPECT FOR AND OUR COMMITMENT  
TO OUR BUSINESS PARTNERS**

# People-Powered Solutions to Advance Business Success

At Allegis Group, we are passionate about our core purpose and always strive to care, bring the highest levels of service, commitment, and competitiveness to everything we do. Our employees are committed to building great relationships with our customers. That commitment helps us better understand our customers' needs and build trust so that conducting business with Allegis Group is not just a transaction but a results-driven relationship.

As part of our service-driven focus, we take great care in recruiting the most talented and qualified contract employees and consultants and in selecting suppliers, vendors and other business partners that are best suited to support our business needs. We aim for everyone associated with Allegis Group to match our high standards of ethical business conduct.

For the sake of our customers and our Company's reputation, we firmly hold our suppliers and vendors accountable for assuring the quality of the goods and services they provide.

## Fair Dealing

We have a responsibility to our business partners, customers, and fellow employees to always conduct our business fairly and with honesty and integrity. We must cultivate and maintain mutual trust and respect with all our stakeholders and avoid engaging in any unfair business practices. This means we will not:

- Use deceptive advertising or marketing activities
- Misrepresent our services or prices
- Agree to anti-competitive practices with our competitors or customers

When entrusted with third party data, we will take steps to secure such confidential and proprietary information as if it were our own. We must not misuse, divulge, or act carelessly with any information provided to us through relationships with our business partners, suppliers, vendors, sub-vendors, customers, employees, contract employees, consultants, or prospective employees/candidates.

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**FAIR DEALING: ACTING IN GOOD FAITH WHEN WE WORK WITH OUR BUSINESS PARTNERS, TO INCLUDE FULLY DISCLOSING RELEVANT INFORMATION, KEEPING OUR PROMISES, AND CARRYING OUT CONTRACTS IN THE MANNER AGREED UPON BY BOTH PARTIES.**

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# Government Partners

Working with the government includes special considerations — including additional rules for interacting with government employees and representatives — that we must be aware of and strictly adhere to. Our Company has a separate policy, the Code of Conduct and Ethics Applicable to Federal Government Procurement Activities (available on the company intranet, StriveNet). If you work with government employees or representatives, you must familiarize yourself and comply with the additional policies and practices contained in the U.S. Government Code of Conduct section before engaging in any work with the government.

## Fair Competition

Our hard work has always been one of the bedrocks of our Company, and we make every effort to ensure that our customers receive superior service at a fair price. Laws regarding competition can be complex, but there are some basic ways through which we can avoid restricting competition and help keep the marketplace open and honest.

### Prohibited agreements with competitors

We cannot enter into any formal or informal agreements with our competitors that may restrain free and open trade. Agreements that seek to fix prices, rig bids, or which divide and allocate markets or customers are illegal. We must also be careful not to share our confidential or proprietary information with our competitors as it could lead to prices or practices that adversely affect our customers. If we find ourselves in a situation where one or more competitors wish to discuss any of these topics, we must immediately end the conversation and report such activity to the Corporate Ethics Officer or the Legal Department.

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#### QUESTION AND ANSWER

**Q: Tomas is a Contracts Manager representing our Company at a job fair when he runs into Victor, who works for one of our competitors in a similar role. Victor says that he thinks it would be a great idea for the two companies to work together more often. For example, he says, if we agree to charge more for a particular service, both companies would profit. What should Tomas do?**

**A: Tomas should tell Victor he has serious concerns with what he is suggesting, and that the Company absolutely rejects the suggestion of collusion in all cases. Tomas should end the conversation with Victor and promptly report it to the Corporate Ethics Officer or the Legal Department.**

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## WHICH OF THE FOLLOWING SITUATIONS SHOW UNFAIR COMPETITION?

Check all that apply.

- ☐ Savannah, an Account Manager, suggests to a competitor that they should compare notes on pricing for similar services.
- ☐ Jorge, a Technical Recruiter, has lunch with a friend who works for a competitor.
- ☐ Michelle, a Contracts Manager, and a competitor agree that, instead of competing for two contracts, the other company will bid for one and our Company will bid for the other.
- ☐ Sarah is managing a client's bid process for the procurement of staffing services and shares other suppliers pricing information with a friend, Joe, who also places a bid.

**A:** The first and third boxes should be checked. Savannah should not attempt to fix prices with a competitor, as this will likely lead to unfair pricing for our customers. Similarly, Michelle should not arrange to rig the bids for these contracts. It's fine, however, for Jorge to meet his friend for lunch as long as they do not discuss confidential business.

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## Handling competitive information

While we have an obligation to compete vigorously with our competitors, we do so in a fair, honest, and open manner. We do not seek or otherwise attempt to obtain our competitor's non-public, confidential, or proprietary information. While we can use publicly available information, we do not use deception, such as posing as a potential customer, to obtain non-public information from our competitors. Information such as pricing, internal customer lists and marketing strategies is not typically available to the public and we should not seek to obtain it. Similarly, we cannot ask other third parties to disclose such information about our competitors to us.

## Teaming agreements and joint ventures

When we discuss teaming with other organizations, particularly organizations that are otherwise competitors, we must be very careful not to share information or enter into any formal or informal agreements which might adversely affect our customers or violate the law or the terms of our service agreement. Before you discuss teaming or joint ventures with a competitor, consult with the Legal Department.



A woman with long brown hair, wearing a blue and white horizontally striped shirt, is smiling and looking to her right. She is holding a grey tablet in her hands. The background is a blurred indoor setting with a brick wall and a window. A dark blue semi-transparent banner is at the bottom left, containing the text "INTEGRITY IN THE GLOBAL COMMUNITY".

# **INTEGRITY IN THE GLOBAL COMMUNITY**

# Anti-Corruption

Our Company conducts business activities around the globe, and we are committed to succeeding through the quality of our people and our services, never through bribery or other corrupt practices. Anti-corruption laws apply to all of our business activities and all of our employees. Even the appearance of improper payments — regardless of their intent — can lead to legal or reputational complications for our Company.

We must take special care to know and follow the anti-bribery laws that apply to business, including the U.S. Foreign Corrupt Practices Act (FCPA) and the United Kingdom Bribery Act of 2010 as well as local anti-bribery laws and the other jurisdictions in which we operate. Be aware that these laws can apply outside the borders of the U.S. and UK. When conducting our business, whether directly or through a third party, we must never provide or accept a bribe or allow anyone else to provide or accept a bribe on behalf of our Company.

Those of us whose work routinely involves services which are provided all or in part in foreign countries or who work with third parties in foreign countries must be familiar with the local and international restrictions involving bribery of foreign government officials. Additionally, we may not engage in “commercial bribery” or kickback schemes. We must never work with third parties who divert funds for any corrupt practices, such as bribery, kickbacks, or improper payments.

Because these laws and issues are complex, please seek guidance from the Corporate Ethics Officer or the Legal Department if you have any questions or believe any of these guidelines have been violated. Please refer to the Company’s Anti-Bribery Anti-Corruption Global Policy (available on the company intranet, StriveNet) for additional details and instructions.

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## ANTI-CORRUPTION DEFINITIONS

- A “BRIBE” IS ANYTHING OF VALUE, INCLUDING BUT NOT LIMITED TO, MONEY, GIFTS, FAVORS, IN-KIND USE OF COMPANY RESOURCES OR ENTERTAINMENT THAT MAY BE VIEWED AS AN EFFORT TO INFLUENCE THE OTHER PARTY’S ACTIONS OR DECISIONS, AN ATTEMPT TO OBTAIN OR RETAIN BUSINESS OR AN EFFORT TO ACQUIRE AN IMPROPER ADVANTAGE.
  - “FOREIGN GOVERNMENT OFFICIALS” MAY INCLUDE EMPLOYEES OF ANY GOVERNMENT OR GOVERNMENTAL AGENCY OF A FOREIGN JURISDICTION, POLITICAL CANDIDATES AND PARTY OFFICIALS, MEMBERS OF ROYAL FAMILIES, EMPLOYEES OF BUSINESSES THAT ARE OWNED OR OTHERWISE CONTROLLED BY A GOVERNMENT, AND EMPLOYEES OF INTERNATIONAL ORGANIZATIONS.
  - A “KICKBACK” IS AN ARRANGEMENT TO RETURN A SUM OF MONEY IN EXCHANGE FOR MAKING OR ARRANGING BUSINESS TRANSACTIONS.
  - “COMMERCIAL BRIBERY” REFERS TO ANY ATTEMPT TO BRIBE CUSTOMERS, PARTNERS, SUPPLIERS, OR ANYONE WORKING ON THEIR BEHALF (“COMMERCIAL PARTNERS”), WITH INTENT TO INFLUENCE THEIR DECISION MAKING.
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## Relationships with government officials

Because of the risk involved, we must be cautious and transparent in our relationships with government officials. Providing gifts and entertainment, no matter how minor, can create issues under anti-bribery laws. If you have any questions regarding relationships with government officials, please contact the Corporate Ethics Officer or the Legal Department.

## Facilitating payments

We also do not provide any payments, even small payments, to officials for routine government actions. In certain parts of the world, it is common for government officials to receive so-called “grease,” “facilitating” or “expediting” payments. These payments are intended to expedite or secure the performance of routine governmental actions from these officials. These routine actions may include:

- Issuing licenses or permits
- Issuing work permits or visas
- Obtaining utility services
- Providing police or fire protection

Our Company does not condone these payments under any circumstances. If you have any questions about whether something may be considered a facilitating payment, please contact the Legal Department.

## Third Party relationships

We can be held responsible for the actions of our business partners, and we seek to work only with partners who follow ethical standards like our own. In compliance with the FCPA, we select business partners, including suppliers, vendors, and sub-vendors, based on objective criteria after conducting appropriate risk based due diligence. Please contact the [Risk Team](#) to ensure that any third party has been properly vetted for anti-corruption purposes. Partnerships and purchasing decisions should never be compromised by personal relationships or inappropriate gifts, favors or entertainment or other potential conflicts of interest.

## International Trade Controls

Our Company takes seriously its responsibilities to support U.S. national security and foreign policy objectives and protect sensitive technologies. As such, we take care to adhere to all U.S. export control laws and regulations. For such purposes, the term “export” is defined broadly and can occur when an item, technology, or technical information is transferred to a person in another country or shared in conversation, email, by phone, or otherwise with a non-U.S. person within or outside the United States. We must pay close attention to any controlled materials or information and follow the appropriate government regulations.

Given the complexity of trade controls, early coordination with Company export control experts is critical. Contact the Export Control Office at [corporateexportcontrolofficer@allegisgroup.com](mailto:corporateexportcontrolofficer@allegisgroup.com) to address all export concerns, however minor, to that individual. Please refer to the Company’s International Trade Controls Policy (available on the company intranet, StriveNet) for additional details and instructions.



## Handling Boycott Requests

We may be approached to boycott certain countries, companies, or other entities. In many countries in which we operate, agreeing to cooperate in an unsanctioned boycotts or related restrictive trade practice is illegal. This means we cannot take any action, provide information, or make any statements that could be viewed as participation in an illegal boycott.

If you are asked to participate in a boycott, you should immediately notify the Legal Department.

## Modern Slavery and Trafficking in Persons (TIPS)

Human rights are valued throughout our organization, regardless of location. We follow all international labor and immigration laws wherever we conduct business. We have a zero-tolerance approach to modern slavery and human trafficking and are committed to acting with integrity in all our business dealings, and with our supply chain, including business partners, suppliers, contractors and other third parties who provide or deliver any goods or services to us. We will not support or deal with any business that is knowingly involved in any form of slavery and/or human trafficking and will take steps to ensure transparency within our business and supply chain. If you have questions or need assistance regarding this mandate, please consult the Legal Department.

## Tax Evasion

Our Company takes seriously its responsibilities relating to fair payment of taxes, and we take care to adhere to all local and international tax laws and regulations. The Company will not support any form of tax evasion either within its own operations or those of its suppliers.



A woman with short dark hair, wearing a black long-sleeved top, is holding a silver tablet. She is looking off to the side with a slight smile. The background is a bright, out-of-focus office space with a window and some desk items.

**HONESTY FOR OUR STAKEHOLDERS  
AND FELLOW EMPLOYEES**

# Accurate Books and Records

Each of us plays a role in assuring the integrity of our Company's business records. Regardless of whether your job includes financial or human resources duties, we all contribute to records of some kind. The Company relies on these books and records to be accurate and reliable in order to make sound business decisions as well as to comply with the many local, national, and international laws that require us to keep accurate and transparent records. Examples of these records may include (but are not limited to) the following:

- Invoices and statements
- Billing, payroll and timekeeping
- Expense reports
- Tax, bank and financial reports
- Employment records
- Reports to government agencies and other public reports
- Contracts

We must prepare these and all other records with care and honesty consistent with our core values. Make sure you know and follow the Company procedures for recording time, funds, and other assets.

We are also committed to never taking part in unethical record-keeping activities, which may include:

- Making false statements (whether verbal or written)
- Inaccurately recording or reporting time worked
- Recording false quality or safety information
- Altering sales, customer, billing or pay information
- Overstating or understating assets or liabilities
- Including non-business-related expenses on expense reports for reimbursement
- Hiding or incorrectly accounting for Company funds

Our Company depends on us to consistently follow our internal procedures and prepare all client invoices accurately, ensuring they reflect the work performed and the appropriate fee for that work. We must make every effort not to circumvent the company's internal accounting controls.

Further, we must always ensure that we provide accurate, actual costs, particularly when submitting information to our government customers or contractors. Our records must also accurately reflect all services performed, payments received, and expenses incurred. Should we determine that there are inaccuracies or errors, we must promptly correct them — however, in order to alter any Company record, we must always obtain proper authorization and notify appropriate Company personnel, such as the Legal, Financial Reporting or Human Resources Departments.



## QUESTION AND ANSWER

**Q: Zachary's job responsibility is to review all invoices for quality control and accuracy specific to the billing terms and contract conditions. This is an important function that ensures we adhere to contract terms, but particularly ensures we deliver world class customer service and accuracy.**

**One afternoon, invoice printing is delayed, and Zachary doesn't receive them on time. Zachary has to leave work to meet a family member by 6 p.m., so he won't have time to review the invoices before he leaves. What should Zachary do?**

- ☐ **Send out invoices without reviewing since no one will notice.**
- ☐ **Review as many as he can and review the rest the next day for accuracy.**
- ☐ **Inform his supervisor of the delay and request an extension to review for accuracy the next day.**

**A:** The second and third boxes should be checked.

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## WHICH OF THE FOLLOWING PEOPLE ARE HANDLING RECORDS INCORRECTLY?

**Check all that apply.**

- ☐ **Lena, a Receptionist, sometimes marks on her timesheet that she worked a full day even when she leaves an hour early.**
- ☐ **Ben, a Regional Controller, noticed an invoicing error — but it was in our Company's favor, so he ignored it.**
- ☐ **Steven, a Customer Support Associate, deletes an email that may be needed for an audit because it contained an unkind comment about a co-worker.**
- ☐ **Heather, a Professional Recruiter, asks a contract employee to not record a particular day of work on his timecard because the customer asked her not to**

**A:** All of the boxes should be checked. Lena should always mark her timesheet for exactly the time she works each day, even if she plans to make up for it by working late another day. Ben should have brought the error to the attention of his manager or supervisor so that it could be corrected. Steven should have retained the email, and also should remember to treat all of his co-workers with respect. Heather should ensure that this employee gets paid for his time worked and should ask the customer why our Company should not pay and bill appropriately.

## Record retention

We also have a responsibility to follow our internal procedures — as well as applicable laws — when storing, maintaining, and discarding paper and electronic business records. We must each know and follow the appropriate schedule for the documents we maintain.

We may not tamper with or manipulate records, or destroy them prior to their destruction dates. The procedure for determining document expiration dates, as well as procedures for storing, maintaining and discarding all records, is described in the Records Retention Policy (available on the company intranet, StriveNet). If you have questions about matters related to records retention, please consult with your Supervisor, your Manager, your Company's designated Records Retention Manager or the Global Data Privacy Officer at [privacyofficer@allegisgroup.com](mailto:privacyofficer@allegisgroup.com).

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## Responding to audits, investigations and inquiries

From time to time, we may be asked by a government agency, customer or supplier/vendor to collect or retrieve documents and other data for internal and external audits, internal or external investigations, and other more formal or informal inquiries. Once our Legal, Compliance or HR Leadership determines that the requestor has the appropriate authority to request this information, it is our duty to promptly and completely provide all the data that is requested.

If a customer requests information, we must confirm that the signed contract allows us to release the information. Even if it does, we should also check with a Legal, Compliance or HR Representative to make sure we are in compliance with ever-changing data privacy laws before sending any information to the customer. If you ever have any questions regarding a customer request, please contact the Legal Department.

We must immediately stop the destruction of relevant records upon receipt of a Litigation Hold Notice. A "Litigation Hold Notice" is a communication issued by legal counsel in connection with current or anticipated litigation, an audit, government investigation or other similar matter. The Litigation Hold Notice requires us to retain all records relevant or related to the allegations in a current or anticipated matter. A Litigation Hold Notice also requires the suspension of automatic disposition or permanent processing of records that may be relevant or related to the current or anticipated matter.

If you know about or suspect any violations of our Code or policies involving accounting, internal controls, auditing matters or records, please immediately report your concerns to the Corporate Ethics Officer or the Legal Department.



# Handling Inside Information

While our Company is not publicly traded, many of our business partners and customers are, so we must be careful when handling a customer's company information. Information is considered "inside" when it is both material (meaning that it could influence the decisions of a reasonable investor) and has not been released to the public. Individuals may not buy or sell any company's stock based on inside information. Doing so is considered "insider trading," and is illegal. "Tipping," which is giving advice to others based on inside information, is also prohibited. We must protect this information just as we would protect any of our confidential and proprietary information.

The securities laws that relate to these matters are complex, so please contact the Legal Department if you have questions related to insider trading. Those of us with access to material, non-public information should take particular care to seek clarification whenever questions or issues arise.

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**INSIDER TRADING:** TRADING ON INFORMATION THAT IS NOT AVAILABLE TO THE GENERAL PUBLIC AND THAT COULD REASONABLY INFLUENCE AN INVESTING DECISION. COMMON EXAMPLES OF INFORMATION THAT COULD GIVE USE TO INSIDER TRADING INCLUDE:

- CHANGES IN EXECUTIVE MANAGEMENT
- FINANCIAL REPORTS THAT HAVE NOT YET BEEN PUBLICLY RELEASED
- PROPOSED OR IMPENDING MERGERS AND ACQUISITIONS

**TIPPING:** PROVIDING INSIDE INFORMATION TO ANOTHER PERSON.

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# Money Laundering

We can all help to keep our Company from becoming inadvertently involved in money laundering by performing careful due diligence on any potential business partners. The Government and International Trade Compliance team can help identify red flags that may signal money laundering activities. For example, ensure that the parties you are doing business with and their management maintain an identifiable physical presence, are engaged in legitimate business and have proper compliance processes in place. If you need more information about how to identify money laundering, you should consult the Legal Department or the [Risk Team](#).

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**MONEY LAUNDERING:** THE PROCESS BY WHICH PERSONS OR GROUPS TRY TO CONCEAL ILLEGAL FUNDS, OR OTHERWISE TRY TO MAKE ILLEGAL FUNDS OR THE SOURCES FROM WHICH THEY WERE DERIVED LOOK LEGITIMATE.

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**PARTICIPATING IN  
OUR COMMUNITIES**

# Political and Charitable Contributions

When we engage in political activity, it must always be clear that we do so in a personal capacity and not on behalf of the Company. Remember that we should never make political contributions with the intention of receiving favorable government treatment for our Company, and keep in mind that any political activity that could seem to be an endorsement by our Company must be approved in advance by the Corporate Ethics Officer or Legal Department. As a rule, we never provide contributions to a political campaign in our Company's name, and we never seek reimbursement for personal political contributions.

All contributions are subject to a complex series of rules that establish, among other things, the amount that can be contributed and the manner in which the contribution may be made. Because political activities are highly regulated, please consult our Corporate Ethics Officer or Legal Department if you have any questions.

# Philanthropy and Corporate Volunteerism

Our Company believes that community involvement is an important piece of personal and professional development, gives individuals the opportunity to promote awareness and understanding within their community, and is one component of Allegis Group's ongoing commitment to Corporate Social Responsibility. The Allegis Group Foundation's primary mission is to provide financial support to qualifying nonprofit organizations and assist employees with community volunteerism. The Foundation's philanthropic efforts are carried out through (1) direct grants to nonprofit organizations, and (2) our employee match program, in which employees apply for funding for an organization for which they are raising funds. The charities we support, both financially and through our volunteer efforts are varied, but in large measure they focus on strengthening the workforce.

# Responding to Media Inquiries

In order for our Company to participate in our communities as a good corporate citizen and cultivate strong community relationships, we must speak with a single, consistent voice that provides an accurate and honest picture of our business. To achieve such consistency, only those who have been designated to communicate on our Company's behalf should make public statements about our Company. All others should direct media inquiries to their Operating Company's Communications or Marketing Department(s).

Similarly, and because we are a privately held company, if anyone requesting financial information contacts you, please refer the request to your Operating Company's Credit Manager or Corporate Controller.



## Environmental Sustainability

We are committed to being good stewards of the environment, and the Company has and will continue to put sustainable practices in place. We strive to be good corporate citizens, and though our industry may not have as large an environmental impact as others, it is our responsibility to strive for an environmentally sustainable workplace that will reduce our footprint through efforts such as:

- Using one stream recycling
- Purchasing recycled materials, including office supplies
- Using low VOC paint
- Minimizing the use of chemical cleaners
- Installing smart lighting systems
- Installing automatic faucets, towel dispensers and hand dryers
- Installing energy efficient HVAC equipment
- Partnering with an environmentally responsible IT asset disposition company
- Upgrading to an energy efficient TIER III data center
- Encouraging employees to print only necessary documents
- Reducing use of paper products
- Providing water dispensers
- Paying employees through direct deposit
- Monitoring and analyzing power consumption and energy use
- Participating in sustainability reporting
- Educating our employees on environmental initiatives
- Hosting environmental friendly events such as Shred-IT and personal asset disposition for employees
- Partnering with nonprofit organizations with an environmental focus

Our Company encourages participation in environmental programs that occur at both the corporate and local office levels.



A woman with long brown hair, wearing a blue sweater, is shown in profile, looking thoughtfully to the left. Her hands are clasped together in front of her. The background is a soft-focus outdoor scene with warm, golden light.

## **OUR COMPLIANCE & ETHICS PROGRAM**

# Administration

Our global Code is administered by our Corporate Ethics Officer, who is responsible for keeping this Code and its referenced policies and procedures up to date as well as providing training on the Code and other ethics and compliance topics. The Corporate Ethics Officer is available to answer any questions or concerns you may have about our Code and policies.

# Internal Investigations and Legal Proceedings

From time to time, the Company will need to initiate internal investigations. The Company has an established procedure and framework for such investigations. It is our duty to assist the Company in conducting internal investigations. The Company will also, from time to time, become involved in legal proceedings requiring our cooperation. If you have made a report regarding an ongoing investigation or are contacted by the Company to provide relevant information, you must cooperate fully and provide complete and truthful information.

# Training

The Company provides training to employees on many of the topics discussed in this Code. We all have a duty to complete mandated and regular training and to familiarize ourselves with this Code and all applicable policies or procedures. Should you feel you need more guidance or have questions or concerns about this Code or any related training or policies, please do not hesitate to contact the Corporate Ethics Officer.



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