

THIRD PARTY CODE OF CONDUCT

ETHICS, COMPLIANCE &
RISK MANAGEMENT 2024



ALLEGIS
GROUP

Table of Contents

2	Purpose of the Third Party Code
2	Compliance with the Law
2	Business Integrity
3	Employment Practices
3	Trafficking in Persons (TIPS)
3	Health and Safety
4	Fair Dealing
4	Trade Controls
4	Anti-Money Laundering (AML)/ Office Foreign Assets Control (OFAC)
4	Sustainability
5	Intellectual Property Rights
5	Assests
5	Confidentiality
5	Privacy
6	Information Security
6	Artificial Intelligence (AI)
6	Gifts and Entertainment
6	Conflicts of Interest
7	Accuracy of Information
7	Training
7	Business Continuity
7	Acknowledgement and Understanding
7	Third Party Diligence
8	Raising Concerns and Non-Retaliation
8	Electronic Version

Purpose of the Third Party Code

At Allegis Group (“Allegis”), we are committed to conducting business in an honest and ethical manner and with the highest standards of integrity and accountability in all countries in which we operate. This foundation serves as an integral shared part of our culture and reinforces the Allegis Core Values of: Character, Relationships, Drive for Results, Serving Others, and Diversity and Inclusion. We feel strongly that our commitment to these Core Values is what sets us apart from the competition, promotes our drive for excellence, and best serves the company, our employees, third parties, and the communities in which we operate.

At Allegis, our business partners, suppliers, contractors, subcontractors, consultants, and vendors (collectively “third parties”) are critical to our success, and we seek third parties who share the same commitment to integrity and Allegis’ Core Values. Allegis expects all third parties to review this Third Party Code of Conduct (the “Code”) and conduct themselves in accordance with the principles and values set forth in this code.

This Code establishes the standards Allegis is committed to, and we expect all our third parties to follow, for both parties’ mutual benefit. This Code should not be read in lieu of, but in addition to, any third party obligations included in any agreements by and between Allegis and the third party. In the event of a conflict or inconsistency between this Code and any applicable agreement, the terms of the agreement will control.



References in this Code to “Allegis” include Allegis Group, Inc. and its subsidiaries and affiliates.

This applies to all third parties of goods or services to any Allegis entity, and to their employees, agents, representatives, and contractors supplying goods to or performing services for Allegis.

Compliance with the Law

Allegis is committed to obeying the law wherever we conduct business. Third parties are expected to comply with all laws and regulations applicable to their business and the rendering of services to Allegis. This is particularly critical when transacting business with Allegis or acting on Allegis’ behalf.

Business Integrity

Allegis is committed to succeeding through the quality of our services and people, and never through bribery, kickbacks, or other corrupt business practices. Third parties must not offer bribes, kickbacks or improper payments of any kind or transfer anything of value, directly or indirectly, to anyone, including government officials or other third parties for the purpose of obtaining or retaining business or gaining an improper advantage. Corruption, extortion, and embezzlement, in any form, are strictly prohibited. Even where local law, custom, or business practices dictate such practices, it is never acceptable to engage in corrupt activity to obtain or retain business on behalf of Allegis.

Third parties acting on behalf of Allegis must comply with the U.S. Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act 2010, and all other applicable global laws dealing with bribery and corruption.

Third parties must keep a written account of all payments (including any gifts, meals, entertainment, or anything else of value) made on behalf of Allegis, or out of funds provided by Allegis. Third parties must provide a copy of this written account to Allegis upon request.

Employment Practices

Allegis uses fair employment practices and strives to provide a safe and productive work environment, in which people are treated fairly, with dignity and respect. Third parties are expected to use fair employment practices and maintain a safe and productive work environment in the following ways:

- » **Fair working conditions:** Adherence to all relevant employment laws, including, but not limited to, those related to maximum hours of daily labor, rates of pay, minimum age, privacy, and other fair working conditions including the prohibition of the use of child labor.
- » **Anti-discrimination:** Creation of a workplace environment free of unlawful bias, prejudice, and harassment, including prohibition of discrimination based on race, color, national origin, religion, sex, age, disability, or any other status protected by applicable law.
- » **Safe Workplace:** Creation and maintenance of a workplace that is free of illicit drugs, alcohol, violence, harassment, and abuse.
- » **Freedom of Engagement:** Prohibition of the use (in any form) of forced, bonded, coerced, or involuntary labor.
- » **Freedom of Association:** Respect the right of employees to freely organize and bargain collectively.

Trafficking in Persons (TIPS)

Human rights are valued throughout the Allegis organization, regardless of location. Allegis follows all international labor and immigration laws wherever we conduct business. We have a zero-tolerance policy towards human trafficking and forced labor. Allegis will not participate in any business relationship that involves illegal exploitation of workers. Third parties must prohibit and take affirmative action to prevent acts of modern slavery, involuntary prison labor, or forced, bonded, slave, or indentured labor from occurring in their own operations and within their own supply chains. Third parties must adhere to all applicable anti-modern slavery and human trafficking laws and regulations in force from time to time, including the UK's Modern Slavery Act 2015. Third parties must not employ child labor and must comply with minimum age provisions set forth in local laws, regulations, and international standards such as the ILO Conventions of Child Labour and UN Global Compact.

Health and Safety

Third parties are expected to conduct themselves in a manner consistent with all applicable health and safety standards, including, but not limited to, governmental, facility-specific, and contractually-imposed standards and requirements. Third parties are expected to establish and maintain safe working conditions and a healthy work environment.

Fair Dealing

Allegis does not focus on results at any cost. No business opportunity, no matter how lucrative, is worth harming Allegis, our employees, and/or our reputation by engaging in dishonest business practices.

Third parties, like Allegis' own employees, must always represent services and prices honestly, fully, and clearly, and never:

- » Use deceptive advertising or marketing activities;
- » Agree to anti-competitive practices with our competitors or customers; or
- » Use any confidential or proprietary information to the third party and/or Allegis' business advantage.

Trade Controls

Third parties are expected to adhere to all applicable trade controls. International trade controls promote national security and take seriously foreign policy objectives. Third parties must understand and are expected to abide by the trade controls of the countries in which they conduct business and/or operate, including export control laws and regulations, sanctions and embargoes, and prohibitions against prohibited boycott activity.

Anti-Money Laundering (AML) / Office Foreign Assets Control (OFAC)

Third parties are expected to comply with all trade and economic sanctions laws of the countries in which they conduct business and/or operate. Third parties are expected to never knowingly facilitate or participate in any money laundering, terrorist financing, or other financial criminal activity and Allegis expects our third parties to promptly report any suspicious activity.

Sustainability

Allegis seeks to do business with third parties who share our concerns for and commitment to sustainable business practices. At a minimum, third parties must meet all applicable environmental rules, regulations, and laws in the countries in which they conduct business and/or operate. In addition, Allegis seeks business relationships with third parties who go beyond legal compliance and consistently look for new and better ways to conserve resources, reduce pollution and waste, and enhance the communities in which they conduct business and/or operate.

Intellectual Property Rights

Third parties are expected to abide by the intellectual property rights of others, including those of Allegis and our third parties. Third parties must take appropriate steps to safeguard and maintain confidential and proprietary information of Allegis and must use such information only for the purposes specified for use by Allegis. Third parties must be aware of trademarks and copyrights and comply with all requirements as to their use as established by Allegis. Third parties must not transmit confidential or proprietary information of Allegis via the internet unless the information is encrypted in accordance with the minimum standards established by Allegis.

Assets

Third parties must protect Allegis assets. Third parties, who have been given access to Allegis's assets, whether tangible or intangible, must use them only within the scope of the permission granted by Allegis.

Confidentiality

Third parties with access to confidential information of Allegis or our third parties must not disclose such information to other parties without the written consent of Allegis or based on the language outlined in the applicable agreement. Such confidential information may include, but is not limited to, the following categories of information:

- » Product pricing
- » Costs
- » Customers
- » Employees
- » Operating systems, policies and practices
- » Designs
- » Production technologies and know-how
- » Engineering, technical, and scientific

Privacy

Allegis takes our responsibility towards protecting Personal Information seriously. For the purposes of this Code, "Personal Information" is defined by the relevant data protection law. When third parties process, handle, store, manage, or access Personal Information in the performance of services on behalf of Allegis, Allegis requires them to ensure that such information is protected against unauthorized disclosure. Third parties are expected to process, handle, store, manage or access Personal Information only in a manner consistent with the terms of the relevant contract and in compliance with applicable data protection laws, and they are expected to protect the Personal Information using appropriate administrative, technical, and organizational safeguards. Third parties' internal policies and procedures must be up to date with all relevant data protection laws (including, but not limited to, GDPR, PIPL & CCPA/CPRA). Third parties are further expected to hold any subprocessors to the same standards expressed in this Code to ensure proper safeguards are maintained during the duration of the agreement and until the Personal Information is deleted or returned.

Information Security

Allegis actively seeks third parties who are committed to maintaining the highest level of information security standards in their own operations and activities. Third parties are expected to adhere to any applicable regulations or standards of information security applicable to third parties' business or operations. Third parties must use Allegis assets and technology responsibly and only for authorized business-related purposes. Third parties must comply with all Allegis requirements and measures for maintaining passwords, confidentiality, security, and privacy as a condition of providing Allegis with goods or services or receiving access to the Allegis internal corporate network, systems, and buildings.

Allegis expects our third parties to perform their work in a way that protects Allegis information. Should a third party become aware of a breach or potential breach that impacts Allegis or the security of Allegis' operations or data, the third party must notify Allegis without undue delay and in accordance with applicable laws and as defined in the applicable agreement.

Artificial Intelligence (AI)

Third parties are expected to use Artificial Intelligence (AI) responsibly, ethically, and free of any form of discrimination or unfair bias. There should be human accountability for the development and use of AI and an understanding of how the AI is making decisions or being used. Third parties must ensure their use of AI in the rendering of services to Allegis or acting on behalf of Allegis complies with all applicable laws.

Gifts and Entertainment

Small gifts, business lunches or dinners, and other common, nominal courtesies can help to strengthen the relationships Allegis maintains with our customers. However, whenever a gift or entertainment is offered in the context of a business relationship, there is a risk that it may influence, or may appear to influence a business decision. Therefore, third parties must not offer gifts or other things of value to any Allegis employee under any circumstances where such gift or entertainment could affect, or appear to affect, decision making or for an undue or improper advantage.

Conflicts of Interest

Allegis conducts business based on what is in the best interests of the company, our employees, our customers, and other third parties. Allegis aims to avoid even the appearance of conflicts of interest and expects the same of our third parties. Therefore, in selecting third parties, personal relationships and/or interests must not affect business decisions. Third parties may not employ or make payment to any Allegis employee during a business transaction. Any familial relationship between a third party and an Allegis employee must be disclosed to others immediately within the organization.

Accuracy of Information

We rely on business books and records to be accurate and reliable to make sound business decisions as well as to comply with local, national, and international laws that require Allegis to keep accurate and transparent records. Third parties must keep accurate records of all matters related to their business with Allegis, including proper recording of all expenses and payments and be prepared to disclose information regarding their business activities, structure, financial situation, and performance in accordance with applicable laws and regulations and prevailing industry practices. Third parties may not delay sending an invoice or otherwise enable the shifting of an expense to a different accounting period.

Training

Suppliers will establish appropriate training measures to allow its employees to gain an appropriate level of knowledge and understanding of the contents of this Code, the applicable laws and regulations, as well as any other generally recognized and applicable standards.

Business Continuity

Third parties are expected to implement a well-designed business continuity program to ensure the availability of critical services to Allegis during a disaster event. Third parties should perform regular testing to validate their critical services can continue with minimal interruption during any type of disruption such as a natural disaster, health epidemic, terrorist/security related event, or any other crisis situation.

Acknowledgement and Understanding

Allegis reserves the right to require third parties to attest to their compliance with this Code from time to time and reserve the right to disqualify, terminate, or decline to do business with, any third party that is not in compliance with, or fails to provide confirmation of their compliance with this Code.

Third Party Due Diligence

Allegis expects third parties to participate in the initial due diligence process as well as responding to necessary inquiries throughout the contract life cycle. Through third party risk assessments, Allegis validates that third parties meet the requirements of Allegis' internal Third Party Risk Management Program. Third parties are expected to timely provide requested information to Allegis, including, but not limited to, financial information to assess financial viability, security, privacy, and artificial intelligence framework and standards, as well as disclosure of legal, regulatory, and financial crime issues.

Raising Concerns and Non-Retaliation

If you suspect or become aware of a good faith concern related to Allegis' business or the conduct of an Allegis employee, please promptly notify Allegis. Reports can be made to the **Allegis Corporate Ethics Officer** at corporateethicsofficer@allegisgroup.com. You may also report your concern through the **Allegis External Hotline** via phone (1-866-377-7489) or via the Internet (www.allegis.ethicspoint.com). Allegis also expects third parties to provide its employees with adequate internal reporting methods.

The Allegis Corporate Ethics Officer will not, to the extent practical and as appropriate under the circumstances, disclose the identity of anyone who reports a suspected violation or who participates in an investigation. Allegis has a zero-tolerance policy for retaliating against another individual for reporting a suspected violation of this Code or other improper behavior when that reported violation is made in good faith.

Electronic Version

For more information and to obtain an electronic version of this document, please visit <https://www.allegisgroup.com/en/about/code-of-conduct>.