



Supplier Code of Conduct

Allegis Group, Inc.

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1. General Policy Statement

Allegis¹ (or the “Company”) values its reputation for conducting business honestly and fairly. Though made up of several Operating Companies, each with distinct cultures, Allegis shares a common foundation of integrity. This foundation serves as an integral shared part of the Allegis culture and works to consistently reinforce the Allegis Core Values: Character, Relationships, Drive for Results, Serving Others, and Diversity and Inclusion. Allegis feels strongly that its commitment to these Core Values is what sets it apart from the competition, promotes its drive for excellence, and best serves the Company, its employees and business partners, and the communities in which it operates.

Allegis views its business partners as critical to its success and seeks suppliers who share its commitment to integrity and Allegis’ Core Values. Allegis expects our suppliers (or “Suppliers”) to be familiar with the Allegis Supplier Code of Conduct (“Code”) and adhere to the same principles that guide Allegis’ own behavior. This, in the end, is what makes Allegis’ partnership with suppliers successful and enduring.

This Code sets forth the standards to which Allegis is committed, and which it expects all of its business partners to adhere to, for both parties’ mutual benefit.

2. Compliance with the Law

Suppliers must comply with all applicable laws, including but not limited to laws relating to employment, human rights, the environment, and health and safety. Allegis encourages its suppliers to comply with the letter and the spirit of these laws. This is particularly critical when transacting business with Allegis or acting on Allegis’s behalf.

Allegis will assess its suppliers’ compliance with this Code and any violations may jeopardize a supplier’s business with Allegis up to and including termination.

3. Business Integrity

Allegis is committed to succeeding through the quality of its people and its services, and never through bribery, kickbacks or other corrupt practices. Corruption, extortion, and embezzlement, in any form, are strictly prohibited. Suppliers 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. 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. Suppliers acting on behalf of Allegis must comply with the U.S. Foreign Corrupt Practices Act, as well as all applicable laws dealing with bribery. Suppliers must keep a written accounting 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. Supplier must furnish a copy of this

¹ References in this Supplier Code of Conduct to “Allegis” include Allegis Group, Inc. and its subsidiaries and affiliates. This applies to all suppliers of goods or services to any Allegis entity, and to their employees, agents, and contractors supplying goods to or performing services for Allegis

written accounting to Allegis upon request.

4. Employment Practices

Allegis uses fair employment practices and strives to provide a safe and productive work environment for all of its employees. Likewise, Allegis expects its suppliers to maintain fair employment practices, including (without limitation) the following:

- a. **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 wage, privacy, and other fair working conditions including the prohibition of the use of child labor.
- b. **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 law.
- c. **Fair Treatment:** Creation and maintenance of a workplace that is free of harassment and abuse.
- d. **Freedom of engagement:** Prohibition of the use (in any form) of forced, bonded, coerced, or involuntary labor.
- e. **Freedom of association:** Respect the right of employees to freely organize and bargain collectively.

5. Trafficking in Persons (TIPS)

Human rights are valued throughout the Allegis organization, regardless of location. Allegis follows all international labor and immigration laws wherever it conducts business. Allegis has a zero-tolerance policy towards human trafficking and forced labor. Allegis will not participate in any business relationship that involves illegal exploitation of workers.

6. Health and Safety

Suppliers 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. Suppliers are expected to be committed to establishing and maintaining safe working conditions and a healthy work environment for all of their workers.

7. Fair Dealing

Fair competition is the cornerstone of the Company. Allegis embraces an entrepreneurial spirit and is committed to obtaining business results. However, this does not mean Allegis focuses on results at any cost. No business opportunity, no matter how lucrative, is worth

harming the Company, its employees and its reputation by engaging in dishonest business practices.

Suppliers, 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
- obtain or use improperly acquired confidential or proprietary information to the supplier and/or Allegis' business advantage.

8. Trade Controls

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

9. Sustainability

Allegis seeks to do business with suppliers who share its concerns for and commitment to sustainable business practices. At a minimum, suppliers must meet all applicable environmental rules, regulations and laws in the countries in which they conduct business. In addition, Allegis seeks business relationships with suppliers 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 operate.

10. Intellectual Property Rights

Suppliers are expected to respect the intellectual property rights of others, including those of Allegis, its affiliates and business partners. Suppliers 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. Suppliers must observe and respect trademarks and copyrights and comply with all requirements as to their use as established by Allegis. Suppliers must not transmit confidential or proprietary information of Allegis via the internet unless such information is encrypted in accordance with minimum standards established by Allegis.

11. Assets

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

12. Confidentiality

Suppliers with access to confidential information must not disclose such information to other parties without the written consent of Allegis. 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

13. Privacy

Allegis takes its responsibility to ensure the appropriate handling and protection of “personal data”, which shall have the meaning given to it under applicable data protection laws or regulations, seriously. Supplier shall only process personal data for the purposes of providing Services to Allegis and not for any other purposes unless Supplier is authorized to do so in writing. When Suppliers handle personal data in the performance of services on behalf of Allegis, they must ensure that the personal data is protected against unauthorized disclosure and is appropriately safeguarded at all times. Suppliers are expected to be aware of and understand all applicable laws and regulations regarding the receipt, handling, safeguarding, and transmission of personal data and to establish processes and procedures to ensure compliance with such laws and regulations (inclusive of GDPR regulations, when applicable) which may include entering into a written data protection agreement with Allegis.

14. Information Security

Suppliers are expected to adhere to any applicable regulations or standards of information security applicable to Suppliers’ business or operations. Suppliers shall use Allegis assets and technology responsibly and only for authorized business-related purposes. Suppliers shall 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 will actively seek Suppliers that are committed to the highest level of information security in their own operations and activities and in those of any subcontractors or suppliers. Allegis expects its Suppliers to perform their work in a way that protects Allegis information. Should a Supplier become aware of a breach or potential breach that impacts Allegis or the security of Allegis’ operations or data, the Supplier must immediately contact Allegis.

15. Gifts and Entertainment

Small gifts, business lunches or dinners, and other common, nominal courtesies can help to strengthen the relationships Allegis maintains with its customers. Whenever a gift or entertainment is offered in the context of a business relationship, however, there is a risk that it may influence, or may appear to influence a business decision. Therefore, Suppliers shall 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.

16. Conflicts of Interest

Allegis conducts business based on what is in the best interests of the Company, its customers and other business partners, and its employees. Individual interests must be subordinated to the Company's interests. Allegis aims to avoid even the appearance of conflicts of interest and expects the same of its Suppliers. Therefore, in selecting Suppliers, personal relationships and/or interests must not affect business decisions. No business partner should employ or make payment to any Allegis employee in the course of a business transaction. Any familial relationship between a business partner and an Allegis employee must be disclosed to others immediately within the organization.

17. Accuracy of Information

The Company relies on 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 Allegis to keep accurate and transparent records. Suppliers 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.

18. 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.

19. Risk Management

Suppliers are expected to implement mechanisms to identify, determine and manage risks in all areas addressed by this Code and with respect to all applicable legal requirements.

20. Acknowledgement and Understanding

Allegis reserves the right to require Suppliers to certify their compliance with this Code from time-to-time and to disqualify, or decline to do business with, any Supplier that is not in compliance with, or fails to provide a certification with respect to, this Code.

21. Raising Concerns and Non-Retaliation

Supplier employees should raise good faith concerns with their employer or with Allegis directly when the matter potentially involves illegal or improper conduct on the part of any Allegis employees or personnel.

The 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. The Company 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. Anyone engaging in retaliatory action against another employee or business partner will be subject to disciplinary action, up to and including termination.

22. Who to Contact

Report any concerns or questions about possible illegal or unethical activity to the Allegis Corporate Ethics Officer at corporateethicsofficer@allegisgroup.com. You may also report your concern through the Company's External Hotline via phone (1-866-377- 7489) or via the Internet (www.allegis.ethicspoint.com).

23. 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>.