

<b>SAMPLE Code of Ethics and Business Conduct</b>	<b>Published Date: 4/2022</b>
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### **Our Core Values**

Own Results.

Take Initiative.

Value Diversity.

Stay Resilient & Solution Oriented.

Act with Integrity.

Speak Plainly.

Build Relationships.

Nurture Talent.

### **Ease of Doing Business and**

The success of our business is dependent on the ease of doing business with us, both internally and externally. We gain credibility by adhering to our commitments, displaying honesty and integrity and reaching company goals solely through honorable conduct. It is easy to *say* what we must do, but the proof is in our *actions*. Ultimately, we will be judged on what we do.

### **Build Trust and Credibility**

Trust and credibility we earn from our internal customers, guests and stakeholders also contribute to the success of our organization. When considering any action, it is wise to ask: will this build trust and credibility for The Company? Is the manner in which we are proceeding effective and efficient? Will it help create a working environment in which The Company can succeed over the long term? Is the commitment I am making one I can follow through with? The only way we will maximize trust and credibility is by answering “yes” to those questions and by working every day to build our trust and credibility.

### **Build Relationships**

We all deserve to work in an environment where we are treated with dignity and respect. The Company is committed to creating such an environment where every person’s contributions are valued.

The Company is an equal opportunity employer and is committed to providing a workplace that is free of discrimination of all types from abusive, offensive or harassing behavior. Any employee who feels harassed or discriminated

against should report the incident to his or her manager or to human resources. Another means of reporting an incident in a confidential manner is by utilizing a Whistleblower Policy.

### **Speak Plainly**

At The Company everyone should feel comfortable to speak his or her mind, particularly with respect to ethics concerns. Managers have a responsibility to create an open and supportive environment where employees feel comfortable raising such questions. We all benefit tremendously when employees exercise their power to prevent mistakes or wrongdoing by asking the right questions at the right times.

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

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

To make our Code work, managers must be responsible for promptly addressing ethical questions or concerns raised by employees and for taking the appropriate steps to deal with such issues. Managers should not consider employees' ethics concerns as threats or challenges to their authority, but rather as another encouraged form of business communication. At The Company, we want the ethics dialogue to become a natural part of daily work.

### **Uphold the Law**

The Company's commitment to integrity begins with complying with laws, rules and regulations where we do business. Further, each of us must have an understanding of the company policies, laws, rules and regulations that apply to our specific roles. If we are unsure of whether a contemplated action is permitted by law or The Company policy, we should seek the advice from the Human Resources department. We are responsible for preventing violations of law and for speaking up if we see possible violations.

### **Confidential Information**

We will not disclose (whether in one-on-one or small discussions, meetings, presentations, proposals or otherwise) any nonpublic material with respect to The Company, business operations, plans, video/photo content, customer names/addresses, financial condition, results of

operations or any development plan. We should be particularly vigilant when making presentations or proposals to customers to ensure that our presentations do not contain material which is unknown to the general public (See Section 4.3)

## **Avoid Conflicts of Interest**

### ***Conflicts of Interest***

We must avoid any relationship or activity that might impair, or even appear to impair, our ability to make objective and fair decisions when performing our jobs. At times, we may be faced with situations where the business actions we take on behalf of The Company may conflict with our own personal or family interests because of the course of action that is best for us personally may not also be the best course of action for The Company. We owe a duty to The Company to advance its legitimate interests when the opportunity to do so arises. We must never use The Company property or information for personal gain or personally take for ourselves any opportunity that is discovered through our position with The Company.

### **Here are some ways in which conflicts of interest could arise:**

1. Being employed (you or a close family member) by, or acting as a consultant to, a competitor or potential competitor, supplier or contractor, regardless of the nature of the employment, while you are employed with The Company.
2. Hiring or supervising family members or closely related persons.
3. Owning or having a substantial interest in a competitor, supplier or contractor.
4. Accepting gifts, discounts, favors or services from a customer/potential customer, competitor or supplier, unless equally available to all The Company employees.

Determining whether a conflict of interest exists is not always easy to do. Employees with a conflict of interest question should seek advice from the Human Resources department. Before engaging in any activity, transaction or relationship that might give rise to a conflict of interest, employees must seek review from the HR department.

### ***Gifts, Gratuities and Business Courtesies***

We should avoid any actions that create a perception that favorable treatment of outside entities by The Company was sought, received or given in exchange for personal business courtesies. Business courtesies include gifts, gratuities, meals, refreshments, entertainment or other benefits from persons or companies with whom The Company does or may do business. We will neither give nor accept business courtesies that constitute, or could reasonably be perceived as constituting, unfair business inducements that would violate law, regulation or policies of The Company or customers, or would cause embarrassment or reflect negatively on The Company's reputation.

### ***Accepting Business Courtesies***

Most business courtesies offered to us in the course of our employment are offered because of our positions at The Company. We should not feel any entitlement to accept and keep a business courtesy. Although we may not use our position at The Company to obtain business courtesies, and we must never ask for them, we may accept unsolicited business courtesies that promote successful working relationships and good will with the firms that The Company maintains or may establish a business relationship with.

Employees who award contracts or who can influence the allocation of business, who create specifications that result in the placement of business or who participate in negotiation of contracts must be particularly careful to avoid actions that create the appearance of favoritism or that may adversely affect the company's reputation for impartiality and fair dealing. The prudent course is to refuse a courtesy from a supplier when The Company is involved in choosing or reconfirming a supplier or under circumstances that would create an impression that offering courtesies is the way to obtain The Company business.

### ***Meals, Refreshments and Entertainment***

We may accept occasional meals, refreshments, entertainment and similar business courtesies that are shared with the person who has offered to pay for the meal or entertainment, provided that:

- They are not inappropriately lavish or excessive.
- The courtesies are not frequent and do not reflect a pattern of frequent acceptance of courtesies from the same person or entity.
- The courtesy does not create the appearance of an attempt to influence business decisions, such as accepting courtesies or entertainment from a supplier whose contract is expiring in the near future.
- The employee accepting the business courtesy would not feel uncomfortable discussing the courtesy with his or her manager or co-worker or having the courtesies known by the public.

### ***Gifts***

Employees may accept unsolicited gifts, other than money, that conform to the reasonable ethical practices of the marketplace, including:

- Flowers, fruit baskets and other modest presents that commemorate a special occasion.
- Gifts of nominal value, such as calendars, pens, mugs, caps and t-shirts (or other novelty, advertising or promotional items).

Employees with questions about accepting business courtesies should talk to the Human Resources department.

### ***Offering Business Courtesies***

Any employee who offers a business courtesy must assure that it cannot reasonably be interpreted as an attempt to gain an unfair business advantage or otherwise reflect negatively upon The Company. An employee may never use personal funds or resources to do something that cannot be done with The Company resources. Accounting for business courtesies must be done in accordance with approved company procedures.

Other than to our government customers, for whom special rules apply, we may provide nonmonetary gifts (i.e., company logo apparel or similar promotional items) to our customers. Further, management may approve other courtesies, including meals, refreshments or entertainment of reasonable value, provided that:

- The practice does not violate any law or regulation or the standards of conduct of the recipient's organization.
- The business courtesy is consistent with industry practice, is infrequent in nature and is not lavish.
- The business courtesy is properly reflected on the books and records of The Company.

### **Accountability**

Each of us is responsible for knowing and adhering to the values and standards set forth in this Code and for raising questions if we are uncertain about company policy. If we are concerned whether the standards are being met or are aware of violations of the Code, we must contact the HR department.

The Company takes seriously the standards set forth in the Code, and violations are cause for disciplinary action up to and including termination of employment.

### **Be Loyal**

#### ***Use of Company Resources***

Company resources, including time, material, equipment and information, are provided for company business use.

Employees and those who represent The Company are trusted to behave responsibly and use good judgment to conserve company resources. Managers are responsible for the resources assigned to their departments and are empowered to resolve issues concerning their proper use.

Generally, we will not use company equipment such as computers, copiers and fax machines in the conduct of an outside business or in support of any religious, political or other outside daily

activity, except for company-requested support to nonprofit organizations. We will not solicit contributions nor distribute non-work related materials during work hours.

In order to protect the interests of the The Company network and our fellow employees, The Company reserves the right to monitor or review all data and information contained on an employee's company-issued computer or electronic device, the use of the Internet or The Company's intranet. We will not tolerate the use of company resources to create, access, store, print, solicit or send any materials that are harassing, threatening, abusive, sexually explicit or otherwise offensive or inappropriate.

Questions about the proper use of company resources should be directed to your manager.

### ***Media Inquiries***

The Company is a high-profile company in our community, and from time to time, employees may be approached by reporters and other members of the media. In order to ensure that we speak with one voice and provide accurate information about the company, we should direct all media inquiries to the Public Relations department. No one may make a public statement and/or issue a press release without first consulting with the Public Relations department.

### **Do the Right Thing**

Several key questions can help identify situations that may be unethical, inappropriate or illegal. Ask yourself:

- Does what I am doing comply with the The Company values, Code of Conduct and company policies?
- Have I been asked to misrepresent information or deviate from normal procedure?
- Would I feel comfortable describing my decision at a staff meeting?
- How would it look if it made the headlines?
- Am I being loyal to my family, my company and myself?
- What would I tell my child to do?
- Is this the right thing to do?