

## Code of Ethics/Employment Expectations

As a *leader in the staffing industry*, we set and achieve high goals in order to be the best. It is truly a unified effort in which the entire organization works to ensure there is no compromise in service, quality, or integrity. Ours is a very demanding, competitive business and we have proven ourselves time and again by adherence to the core principles, policies and practices best suited to our total organization. One of our key values is integrity toward all three sets of clients, to include our internal associates, customers, and talent alike. In every decision and action we make in moving our mission forward, it is critical that we ask ourselves:

- Will this decision/action build trust and credibility with our associates and with our customers?
- Is this decision/action fair?
- Is it legal?
- Is it the right thing to do?
- Will this decision/action lay the foundation for long-term company success?
- Will this decision/action help us drive the mission forward?

The purpose of this policy is to provide guidance to associates on what is acceptable vs. unacceptable behavior by the company and by its associates in effort to continuously be viewed as a company of integrity.

### OUR EXPECTATIONS

It is our expectation that every associate will conduct themselves with high integrity and honesty. More specifically, it is expected that all associates conduct themselves by the following expectations:

- Comply with Atterro's policies and procedures.
- Protect all confidential information inside and outside of the organization.
- Produce exceptional quality of work.
- Maintain high ethical standards in all decisions that are made.
- Serve all three sets of clients (internal associates, customers, and talent alike) with respect, professionalism, and integrity.
- Continually think about ways to improve policies, procedures, and service.
- Respect others' opinions.
- Be dependable and maintain your regular work schedule; give your best effort to the company at all times.
- Maintain professional relationships with customers and suppliers to include acting in an appropriate and respectful manner when either entertaining customers or being entertained by suppliers.

It is our expectation that you will not display the following behaviors:

- Have excessive absenteeism or tardiness.
- Supply false or misleading information when applying for employment or at any time during your employment.
- Possess, consume, sell, or be under the influence of narcotics or related drugs including alcoholic beverages while at work or on Atterro property. This includes refraining from drinking alcoholic beverages during client lunch appointments.
- Discriminate against or unlawfully harass a fellow associate, talent, or customers because of race, religious creed, national origin, sex, disability, age, marital status, veteran status, sexual preference or membership in any other group protected by law.
- Make unwelcome advances, requests for sexual favors and other verbal or physical expressions of a sexual nature to fellow associates, talent or customers.
- Conduct yourself unprofessionally with behavior such as fighting or use of vulgarity.
- Engage in any dishonest or fraudulent act.
- Misappropriate any funds, securities, supplies or other assets of Atterro.
- Engage in impropriety in the handling or reporting of money or financial transactions.
- Engage in profiteering as a result of insider knowledge of company activities.
- Take or otherwise misappropriate Atterro property.
- Use Atterro's computer systems in any way that may reasonably be considered illegal, insulting, disruptive, or offensive by other personnel, or harmful to workplace morale.

- Disclose confidential and/or proprietary information to outside parties or to parties within the organization that do not have a need to know.
- Destroy, remove, or inappropriately use records, furniture, fixtures, and equipment.
- Participate in conduct that would be considered a conflict of interest. For example: being employed by, or acting as a consultant to a competitor or potential competitor, supplier or contractor of Atterro, regardless of the nature of the employment, while being employed with Atterro.
- Accept gifts that constitute (either perceived or real) unfair business inducements that would violate law, Atterro policies or would reflect negatively on Atterro in the marketplace (*associates may, however, accept unsolicited gifts, other than money, that are reasonable and ethical to include, but not limited to: flowers, fruit baskets, or other modest gifts to commemorate a special occasion; or other nominal gifts that are given for advertising or promotional purposes*).

#### **FAILURE TO MEET OUR EXPECTATIONS**

Failure to meet our expectations or engaging in unacceptable conduct may result in discipline up to and including termination. Please understand that the expectations of proper and improper conduct discussed above are not all inclusive.

If ever your employment with Atterro is suspended pending an investigation into an alleged workplace conduct violation regarding harassment, discrimination, theft, violence, misappropriation of Atterro or Atterro client property, providing false information, or other egregious conduct, Atterro reserves the right to treat that suspension as unpaid time, for full day absences, pending the outcome of the investigation.

For clarification purposes, “other egregious conduct” would not include that relating to your attendance and/or performance.

Your employment with Atterro is at-will. Employment at-will means that either Atterro or any associate may terminate the employment relationship at any time, without prior notice and for any reason.

#### **REPORTING UNETHICAL BEHAVIOR OR FRAUD**

If Atterro is not informed of inappropriate and/or unethical or fraudulent behavior, we will be unable to fully respond to your concerns of inappropriate behavior and/or unethical or fraudulent behavior. Associates must follow any of the procedures below for reporting such conduct:

1. The associate can immediately report the incident directly to Atterro by notifying their supervisor, manager, or Human Resources.
2. The associate can report the incident to EthicsPoint, Atterro’s third party vendor, by calling toll-free at (877) 228-5416.
3. The associate can report the incident to EthicsPoint via the web at [www.ethicspoint.com](http://www.ethicspoint.com) and click on “file a report”.
4. The associate can report the incident to EthicsPoint via the portal page at [www.Atterro.ethicspoint.com](http://www.Atterro.ethicspoint.com).

It is important to note that all complaints will be kept as confidential as possible, however, Atterro cannot guarantee absolute confidentiality because of its need to investigate the conduct and take appropriate action. In addition, Atterro will not retaliate or tolerate any retaliation against persons for making any good faith complaints under this policy or participating in any investigation.