



## **Code of Conduct**

*Effective: January 1, 2023*

### **Purpose**

This Code of Conduct applies to all employees of Axiom Administrative Services LLC ("Axiom"), full and part time, no matter their location. In addition to this Code, all employees are required to comply with all other applicable policies, including the Employee Handbook.

Axiom is committed to doing business in an ethical and law-abiding manner. Each employee is responsible for knowing and adhering to the values and standards set forth in this Code of Conduct and for raising questions if they are uncertain about company policy. This means more than just complying with laws and regulations. It also means the following:

- Taking responsibility for the safety of yourself and others
- Treating others with dignity and respect
- Building trust and credibility
- Conducting business with utmost integrity and only for the benefit of the company
- Assuring that financial reports are accurate safeguarding confidential information
- Protecting and properly using company assets
- Conducting business fairly and lawfully

Integrity and ethical conduct are the fundamental support for Axiom's core values and achievement of our overall vision.

Axiom expects the highest ethical conduct from each employee. This commitment to ethical conduct is vital to recruiting and retaining the principled people needed to ensure the ongoing success of Axiom and our relationships with our customers, vendors, partners, and clients.

This Code cannot specifically address every conceivable situation we may encounter, but that does not relieve us of responsibility to do the right thing.

### **Treating Others with Dignity and Respect**

Axiom is committed to creating an environment where we all are treated with dignity and respect. We must understand and appreciate the importance of diversity and inclusion, fostering an environment that values individual differences and encourages every employee to reach their full potential.

Axiom is an equal employment/affirmative action employer and is committed to providing a workplace that is free of offensive, insulting, hostile or intimidating behavior of any type, including that related to words, actions, documents or pictures. We must conduct ourselves in the workplace without regard to race, color, religion, sex, gender, sexual orientation, national origin, citizenship, age, genetic information, physical or mental disability, veteran status or any other protected basis. Any employee who feels harassed or discriminated against should report the incident to his or her manager and/or human resources.

All Axiom employees are also expected to support an inclusive workplace by adhering to the following conduct standards:

- Address and report inappropriate behavior and comments that are discriminatory, harassing, abusive, offensive or unwelcome



- Foster teamwork and employee participation, encouraging the representation of different employee perspectives
- Seek insights from employees with different needs, abilities and/or obligations
- Avoid slang or idioms that might not translate across cultures
- Support flexible work arrangements for co-workers with different needs, abilities and/or obligations
- Confront the decisions or behaviors of others that are based on conscious or unconscious biases
- Be open-minded and listen to constructive feedback

### **Sexual and Discriminatory Harassment**

Axiom will not tolerate sexual or discriminatory harassment, whether committed by our employees, contractors or customers. If you experience sexual or discriminatory harassment, or if you believe a co-worker is experiencing such harassment, you have both a right and a duty to report it promptly to management. You may report such harassment to your supervisor, your supervisor's direct manager, human resources, or to the EthicsPoint hotline at 1-833-609-4914 or via the EthicsPoint website at <https://axiom.ethicspoint.com>. For more information regarding Axiom's policy prohibiting sexual or discriminatory harassment, please refer to our Employee Handbook.

### **Prevention of Workplace Violence**

We should all be able to work in an environment free from violence and threats of violence. We will not tolerate any act of workplace violence on our property or at any company sponsored event. If you are aware of a workplace violence incident or a potential threat, you must immediately report such acts to a member of management, human resources, or to the EthicsPoint hotline at 1-833-609-4914 or via the EthicsPoint website at <https://axiom.ethicspoint.com>.

### **Build Trust and Credibility**

The success of Axiom is dependent on the trust and confidence we earn from our employees and customers. 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.

### **Conducting Business with Utmost Integrity and Only for the Benefit of the Company**

We must perform our job responsibilities ethically, lawfully and with unwavering integrity. We must always conduct ourselves in a manner that reflects positively on Axiom and refrain from behavior that would harm Axiom's reputation or commercial position. Behavior that is motivated by, or even creates the perception, that our decisions and actions are motivated by personal relationships or personal gain violates our standards of conduct.

### **Gifts and Entertainment**

Depending on the circumstances, giving and accepting gifts, entertainment and business courtesies to and from suppliers or to current and prospective customers may give rise to an appearance of impropriety. We must avoid any situations where the giving or accepting of a gift or entertainment would be – or could appear to be – inappropriate, unlawful or in conflict with the best interests of Axiom. We may never solicit gifts or entertainment, nor may we give or accept gifts of cash or cash equivalents.

### **Conflicts of Interest**



A conflict of interest exists when our personal financial interest or activities – or those of a family member – influence or interfere with performance of our job responsibilities or otherwise run counter to our obligation to act in the best interests of Axiom. An example of a conflict of interest includes using confidential company information for personal gain.

### **Protecting and Properly Using Company Assets**

In accordance with our Use of Company Property Policy, employees must use company assets efficiently and only for legitimate business purposes and we must protect them from loss, damage, misuse and theft. Company assets include property, operating facilities, equipment and accounts receivable, as well as confidential information, trade secrets, business records, corporate information resources and copyrighted material.

Integral to Axiom's success is our protection of confidential company information, as well as nonpublic information entrusted to us by employees, customers and business partners. Axiom's confidential information includes, without limitation, financial information, business forecasts, sales and marketing plans, customer lists, processes, techniques, ideas, inventions (whether patentable or not), discoveries, methods, strategies, intellectual property, technology, and software. Axiom retains all rights to data and other information stored, processed, or transmitted on its computers, mobile devices, and networks. Employees must not disclose Axiom's confidential information without a valid business purpose and proper authorization.

### **Records and Information Management**

Axiom must create and maintain appropriate, accurate and complete business records and information. These records are critical to meet our business needs and any falsification is a serious offense. All information maintained in any medium, including paper and electronic, on Axiom's company assets is the property of Axiom. We must retain business records and information in accordance with retention periods established by Axiom. This includes retaining records and information in accordance with hold notices issued for any litigation matters.

### **Copyrighted Material**

The Internet, email and photocopy machines have made it extremely easy and convenient to download, copy, and/or reproduce articles, newsletters and other publications in whole or in part. However, these actions may violate copyright laws or license agreements. Always assume that articles, books, magazines, newspapers, trade journals, newsletters, photographs, technical drawings, and other hard copy and electronic publications and all software are protected by copyright law.

Computer software is almost always protected by copyright law, even if a copyright notice or copyright symbol is not displayed. We must comply with all restrictions on copying, using and distributing computer software pursuant to the terms of the applicable license agreement. We must also ensure that others who receive services from Axiom comply with the terms of our intellectual property license applicable to the services provided.

### **Corporate Identity**

Axiom's trade names, trademarks and service marks are the graphic identity of the products and services that our customers recognize and rely on worldwide. We must protect the integrity of these identifiers by using them consistently, uniformly and in compliance with all company policies. We must respect the trademark rights of others and must not use the corporate names, logos or marks of other companies without the prior written approval of the owner.



### **Conducting Business Fairly and Lawfully**

Each of us has a duty to conduct business fairly and in compliance with all applicable laws and regulations. Fraud, theft, embezzlement, false or inflated billings, falsified expense reports and payment of kickbacks for obtaining business are a few examples of illegal and unacceptable conduct.

### **Antitrust**

We must not take any action or enter into an informal understanding or agreement with competitors to restrain trade or undermine free and fair competition. We must compete independently in the marketplace in compliance with antitrust and competition laws. Examples of antitrust violations include: price fixing, bid rigging, allocation of markets or customers, agreements to manipulate production volumes and group boycotts.

### **Anti-Bribery and Anti-Corruption**

Axiom is committed to doing business around the world with the utmost integrity and in full compliance with all applicable anti-corruption laws. We do not tolerate any form of bribery or corruption. Axiom also prohibits anyone acting on its behalf from making, offering, soliciting, or receiving bribes or improper payments.

### **Unfair, Deceptive and Abusive Acts and Practices**

It is the policy of Axiom to comply with Section 1036 of the Dodd-Frank Act, which prohibits “unfair or deceptive acts or practices in or affecting commerce,” and all published guidance by the Consumer Financial Protection Bureau (CFPB) regarding managing risks relating to unfair, deceptive, and abusive acts and practices, as applicable. For more information, please read our [Unfair, Deceptive and Abusive Acts and Practices \(UDAAP\) Policy](#).

### **Anti-Slavery and Human Trafficking**

Axiom does not engage in or support child labor, human trafficking or slavery. We expect the same from our suppliers. Axiom does not support or do business with companies that are known to utilize any form of child labor, slavery or human trafficking.

### **Our Ethics and Compliance Program**

This Code of Conduct is an important component of our ethics and compliance program. Doing what’s right must be embedded in the way we make decisions and conduct business. All of us share the same commitment to promoting a positive and ethical culture to maintain the long-term success of Axiom.

### **Reporting**

Nothing in this Code prohibits or restricts Axiom from taking any disciplinary action in connection with any matter pertaining to employee conduct, whether or not it is expressly discussed in this Code. Any person who is found to be in violation of this Code of Conduct will be subject to disciplinary action which could include immediate suspension or termination of employment. Axiom prohibits anyone from retaliating against employees because they have filed a Code of Conduct policy complaint.

Axiom will investigate all reported instances of questionable or unethical behavior. In every instance where improper behavior is found to have occurred, Axiom will take appropriate action. We will not tolerate retaliation against employees who raise genuine ethics concerns in good faith. If you know an employee who is acting in an unethical manner, please report them to your supervisor, local Human



Resources, or the EthicsPoint hotline at 1-833-609-4914 or via the EthicsPoint website at <https://axiom.ethicspoint.com>.