

BUSINESS PARTNER CODE OF CONDUCT POLICY

This Code of Conduct (“the Code” or “Code”) for business partners of JeffreyM Consulting provides the foundation on which we build trust with the companies, Clients, or any other party we partner with. We strive to conduct business with partners who share our commitment to high ethical standards and who operate in a socially and environmentally responsible manner. It outlines our expectations regarding basic compliance with federal, state and local laws, and respect for labor practices, human rights, environment, sustainable procurement practices, and ethics.

OBJECTIVE

JeffreyM Consulting adopts this Code of Conduct Policy to ensure orderly operations and provide the best possible work environment. JeffreyM Consulting is committed to upholding the highest ethical standards, as well as complying with applicable laws and regulations, this Code and any other Company policies or requirements. We expect the same from our employees, as well as the companies and Clients we partner with.

JeffreyM Consulting provides services to a wide variety of businesses across the globe, and we want to ensure that our Clients feel confident that our conduct within JeffreyM Consulting is an extension of theirs, and vice versa.

BUSINESS PRACTICES

In addition to maintaining and enforcing this policy to protect the interests and safety of all employees and the organization, JeffreyM Consulting complies with all applicable federal, state, and local laws and regulations concerning employer/employee rights and obligations, business practices, and processes, and we expect the same of the companies and Clients with which we partner.

LABOR PRACTICES & HUMAN RIGHTS

JeffreyM Consulting and its business partners must know and comply with all applicable employment laws and support human rights for all people.

- **Health & Safety:** We expect our business partners to provide Assigned Employees with a safe work site and provide appropriate information, training, and safety equipment with respect to any hazardous substances or conditions to which they may be exposed at the work site, including directives regarding prevention of and protection from pandemic illnesses.
- **Treatment of Assigned Employees:** We expect our business partners to treat Assigned Employees with dignity, respect, and equal opportunity, and to provide a workplace free of all forms of discrimination and harassment.
- **Prohibit Child Labor, Forced Labor & Trafficking:** JeffreyM Consulting supports laws that prevent and punish any form of exploitation or trafficking of children or other vulnerable persons. We are committed to complying with all applicable laws and regulations intended to help prevent child labor, forced labor, and human trafficking, and we expect our business partners to operate with these same commitments.
- **Wages & Benefits:** We expect our business partners to comply with all applicable wage and hour laws and regulations, and to provide legally mandated benefits to their workforce.
- **No Retaliation:** We expect our business partners to implement a no-retaliation policy that permits Employees or Assigned Employees to speak with staff at either company without retaliation.

ENVIRONMENT & SUSTAINABLE PROCUREMENT

JeffreyM Consulting respects the preservation of natural resources and improvement of the environment and is committed to taking responsibility and mitigating the environmental impact of our operations. We comply with environmental laws and regulations and cooperate with communities in environmental protection efforts, and expect our business partners to do the same.

- **Respect the Environment:** We expect business partners to evaluate the environmental impact of their activities, to have internal policies to ensure efficiency and compliance, and to make continuous improvements in environmental protection.
- **Sustainability:** JeffreyM Consulting expects business partners to support us in achieving our sustainability goals, and to be working towards continuous improvement of their own sustainability performance.

- **Resource Reduction:** We expect business partners to strive to reduce, eliminate or prevent waste by reviewing equipment energy usage and lifecycles.

ETHICS

JeffreyM Consulting is committed to upholding the highest ethical standards.

- **Financial Integrity:** JeffreyM Consulting prohibits bribery, extortion, kickbacks, and/or facilitation payments in any of its dealings with our business partners, or any other party. Business partners must comply with all applicable anti-bribery, anticorruption and conflicts of interest laws to which they are subject.
- **Data Privacy and Security:** JeffreyM Consulting expects that their business partners will respect confidentiality, intellectual property, and data privacy rules. Any information collect is to be used solely as permitted and for legitimate business purposes. Proper agreements must be in place before collecting, processing or transferring personal data to third parties.
- **Confidentiality:** Respect the privacy of JeffreyM Consulting, our Assigned Employees, or any other party, and do not share Personally Identifiable Information (PII).

COMPLIANCE

JeffreyM Consulting does not assume any responsibility to monitor or ensure compliance with this Code. It is up to each of our valued business partners to determine how to meet and demonstrate compliance with the commitments outlined in this Code. Any violation of this Code may result in termination of the contract with JeffreyM Consulting, considering all other contractual terms in place.

RAISING CONCERNS AND REPORTING QUESTIONABLE BEHAVIOR

We take our Code of Conduct seriously, we take our Clients' Code of Conduct seriously, and we expect the same of our employees and business partners. If a business partner is unsure of how to act in a given situation, we expect them to reach out and seek guidance in support of a shared goal to abide by these commitments.

Business partners that become aware of a violation in relation to their partnership with JeffreyM Consulting must reach out promptly to our Human Resources & Compliance Department at:

Michelle Ruane
Director of Human Resources
micheller@jeffreym.com
206.258.4972

JeffreyM Consulting will maintain confidentiality to the extent possible and will not tolerate any retaliation taken against any individual who has, in good faith, sought advice or reported questionable behavior or possible violation of the JeffreyM Consulting or Business Partner Code of Conduct.

RIGHT TO MODIFY POLICY

JeffreyM Consulting has the right to change, modify or approve exceptions to this policy at any time with or without notice.