American Computer Services, Inc.

WE ARE YOUR TEAM
PROFESSIONALS READY TO COLLABORATE

ACS Code of Conduct

Version #1

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A message from our President and CEO

At American Computer Services Inc. (ACS), we've spent over a quarter-century fostering trust by connecting people and customers with resources characterized by integrity, honesty, and responsibility. I take immense pride in what our team has achieved thus far, and I'm invigorated by our ongoing mission.

While innovation and evolution drive us forward to meet the ever-changing needs of our customers, one principle remains constant: our unwavering commitment to ethical decision-making in all facets of our operations.

At ACS, we cultivate a culture that goes above and beyond every assignment. We hold ourselves to the highest standards, always ensuring the right thing is done. I rely on each of you to lead by example, honor your commitments, and uphold our values, which include taking care of one another, doing good, maintaining excellence, driving results, and envisioning the future.

Our Code of Conduct serves as a compass for every team member, outlining essential legal, ethical, and behavioral expectations. We operate an open-door policy, encouraging any team member to seek guidance or raise concerns with a manager, human resources, or legal representative at any time.

We are steadfast in our commitment to preventing retaliation against those who report concerns in good faith. If you believe a violation of the law, our Code, or our policies has occurred, you can contact the ACS Integrity Line. Rest assured, we will promptly and diligently address any issues that arise.

Every day, we build upon our legacy, fortifying ACS for the future by acting with integrity and refusing to settle for anything less than excellence.

Sincerely,
   Abigail Dickey
   President and CEO

The Code

The Code applies universally to all individuals working with or on behalf of American Computer Services Inc. (ACS), including employees, contingent staff, and the ACS leadership team. This inclusive approach ensures that everyone is held to the same ethical standards regardless of their role or status within the organization.

The Code outlines our commitment to upholding the highest levels of business ethics and integrity. This commitment serves as a guide for all interactions and decisions made by all individuals within ACS.

The Code reflects ACS's core values, in which ethics and integrity are fundamental aspects of our identity. We seek to foster a culture where ethical behavior is not just a requirement but an integral part of our work.

The Code sets a clear standard for conduct within ACS. It is a shared responsibility that is deeply ingrained within ACS's work culture.

The ACS leadership team has approved the code. We disclose any additions or changes to this Code on our website (acs-team.com).

Your role
- Read the code.
- Live the code.
- Come back to the code whenever you have a question or concern.

Our Vision, Mission, and Core Values

Our Vision

ACS's vision is bold and ambitious. It aims to distinguish itself from competitors by earning recognition for the superior quality of its work, the exceptional service it delivers, and the integrity with which it interacts with all employees and business associates. Customers will eagerly choose to collaborate with ACS on any engagement, while employees will take pride in identifying themselves as members of the American Computer Services team.

Our Mission

ACS's mission is straightforward and purposeful. It endeavors to excel in every service it offers, consistently adding value for customers wherever feasible and delivering results that contribute to the success of its organizations.

Our Core Values

Our Core Values of ethics and integrity are the fundamental ideals that ACS upholds as we strive to fulfill our vision and mission. These values are embedded within our identity and serve as guiding principles that are essential in shaping the behavior and choices of individuals within ACS daily.

Living the Code

How do I Live the Code?

Adhere to our Code

Adherence to our Code is a fundamental expectation from every member of our company, irrespective of their role, function, or whereabouts. Whether you're a recruiter or contractor or hold any other position representing ACS, it's imperative to uphold the standards outlined in this Code. We hold ourselves and those representing our organization to the highest ethical standards, fostering a culture of integrity, accountability, and excellence across all facets of our company.

Follow the Law

ACS operates within various legal jurisdictions, each with its own set of laws and regulations. As such, it is paramount that we conduct our business activities in strict adherence to the applicable laws and regulations of the United States and the states and communities in which we operate.

Every individual within ACS must be responsible for understanding and abiding by the relevant legal requirements pertaining to their respective roles and functions. We recognize that legal matters can often be intricate and nuanced. Therefore, should you encounter any uncertainties or questions regarding compliance, we encourage you to contact the ACS leadership team for guidance and clarification.

Commit to the Highest Ethical Standards

Our commitment to ethical conduct transcends mere compliance with legal mandates. At ACS, compliance is the foundation of our business practices. However, your role goes beyond simply adhering to laws and regulations. As a member of our team, you are responsible for upholding the principles of integrity, honesty, and ethical behavior in all aspects of your work. By incorporating these values into our daily operations, we fulfill our legal obligations and demonstrate the highest standards of professionalism and integrity. This fosters trust and confidence in ACS and helps us build strong, long-lasting relationships with our clients.

If you're faced with a decision without a clear course of action, ask yourself:
- Will my decision reflect our core values?
- How would the decision make customers, co-workers, family, and friends feel about ACS and me?
- Am I willing to be held accountable?

Understand and Manage Risk

Risk is an inherent aspect of operating within the consulting services industry, encompassing a spectrum of potential events that could potentially disrupt our strategic objectives or affect our financial outcomes. ACS is exposed to various financial, pricing, operational, and business risks, which requires a proactive and collective effort in risk management.

Effective risk management is not the responsibility of a select few but a shared duty of every individual. We can make informed judgments that align with our objectives by identifying, understanding, and evaluating the risk and reward trade-offs inherent in various decisions.

Report Your Concerns

It's important to promptly report activities that you believe may violate our Code.
<u>See</u> "How do I report suspected violations?".

Attention Employees

Who gets this Code?

Upon hiring and annually during their employment, all employees receive the Code of Conduct for review. If you have not received the Code of Conduct, contact the ACS leadership team. Any significant policy changes will be communicated to you either by the ACS CEO or leadership team.

Nothing in this Code prevents you from reporting potential law violations to relevant government authorities.

Certification

All employees are responsible for certifying that they have read this Code of Conduct and agree to act in ways that meet our principles of integrity and ethical expectations. This certification is a signed acknowledgment form that all employees receive and complete during initial onboarding and annually during employment with ACS.

The completed Code of Conduct Acknowledgment Form shall be placed in the employee's personnel file.

Consequences of violating the Code

Violating this Code can put our company at risk. Failure to follow the Code will result in appropriate disciplinary action, which could include losing your job or relationship with American Computer Services, Inc.

Understand the Law

You don't need approval to post or distribute information for activities protected by the National Labor Relations Act during non-work time and in non-work (common) locations.

Additional Responsibilities for Leaders

Leadership comes with additional responsibilities beyond simply adhering to the established Code of Conduct. These expectations extend to several key areas:

- Leaders must actively promote awareness of policies and standards, ensuring employee understanding and compliance in daily activities and setting a positive example by consistently demonstrating ethical behavior and integrity in their actions.
- Leaders cultivate an environment of openness and honesty where employees feel comfortable voicing their opinions and concerns without fear of reprisal.
- Leaders must handle raised concerns with respect, appreciation, and confidentiality. They must recognize the potential consequences of non-compliance with the Code, understanding that it could harm the organization's reputation. Part of their role involves proactively identifying and addressing potential risks to prevent incidents or crises from occurring.
- Leaders must be well-versed in the processes for escalating issues or concerns to the appropriate channels when necessary. This ensures that problems are addressed effectively and promptly, safeguarding the integrity and well-being of the organization as a whole.

Additional Policies and Standards

No set of documents can cover every legal or ethical question. You may encounter situations where your ethical obligations may not be clear, or you may be unfamiliar with the relevant body of law. When a decision isn't clear, you're expected to ask for help making the right decision.

Waivers

Any waiver of this Code would be granted only under exceptional circumstances.

Questions

We encourage you to contact the ACS leadership team for guidance and clarification if you encounter any uncertainties or questions about the Code of Conduct.

Working with Business Partners and Customers

Our focus is on the best interests of our customers and employees. ACS is an ethical, trustworthy company that takes seriously every interaction with our business partners and customers.

Highlighted topics:
› Fair Dealing
› Competition Laws Compliance
› Sourcing and Supplier Management
› Managing Suppliers
› Customer Satisfaction

Fair Dealing

Fair dealing outlines the ethical principles and guidelines that all employees must follow to ensure honesty, integrity, and fairness in all business interactions.

ACS has an outstanding reputation for integrity in the industries in which we provide services. That's why ACS takes great care in truthfully representing our consulting services.

Your role
- Employees must always provide accurate and truthful information about ACS services and business practices to customers and suppliers.
- Be truthful about ACS services and capabilities. Don't misstate facts, give false impressions, or exaggerate to gain business or acquire talent.
- Never take unfair advantage through various unethical practices such as manipulation, concealment, or misrepresentation.

Competition Laws Compliance

Competition laws, also known as antitrust laws in some jurisdictions, are regulations enacted by governments to promote fair competition and prevent anti-competitive market practices. These laws aim to safeguard consumers, promote economic efficiency, and ensure a level playing field for businesses.

ACS aims to outperform competitors but emphasizes fair and honest practices. ACS is committed to complying with all competition (antitrust) laws in the United States.

Your role
- Don't discuss or make agreements with competitors about issues related to non-public, competitively sensitive information (including but not limited to billing rates or compensation rates) or about not doing business with an individual or entity.

- Never share information with competitors or make agreements comparing bids or selective bidding.
- Never communicate with competitors or strategize with them about allocating consulting resources in a way to gain revenue with a customer or with their departments, divisions, or teams.

Sourcing and Supplier Management

Supplier management involves the systematic oversight of relationships with external suppliers to ensure the efficient and effective delivery of goods and services that meet the organization's needs.
- ACS emphasizes working with suppliers who share similar integrity standards.
- ACS follows a fair and objective process for selecting suppliers, conducting due diligence, minimizing risks, and actively monitoring supplier performance throughout the contract period.
- Adherence to company standards for executing contracts and managing supplier performance is emphasized.
- Evaluate suppliers based on criteria such as quality, reliability, price, and compliance with ethical and environmental standards.
- Conduct due diligence, including background checks and site visits, to assess a supplier's capabilities and reputation.
- Evaluate suppliers based on criteria such as capability, capacity, quality, cost, reliability, geographic location, and cultural fit.

Managing Suppliers

The ACS Leadership team manages all supplier contracts and relationships, monitoring compliance, performance, risk, and the organization's needs.

Customer Satisfaction

ACS strives to deliver excellent customer satisfaction consistently. Our business dealings with customers, vendors, employees, applicants, suppliers, and other third parties are based on principles of honesty, fairness, and respect. Our core values of starting with the customer and integrity paired with a servant attitude have historically resulted in high marks for customer satisfaction. We provide staffing of specialized consultants within Business, Information Technology (IT), and the Project Management Office (PMO). Our people, the heart of our organization, have certifications and proven senior-level experience in the customers' specific industry. We heavily recruit across the United States and the world, seeking this type of talent. During the interview and hiring process, ACS focuses on applicants who possess the following qualities to join our amazing team:
- Integrity
- Respect
- Patience
- Empathy

•Conscientious
•Responsiveness

Most ACS Customers keep a scorecard on the individual consultants' performance throughout their time with them. Over 98% of our consultants are rated for rehire.

Additionally, ACS does not include a non-compete clause, which results in multiple customers offering our consultants full-time positions within their company.

Business Ethics Policy

ACS is committed to following the laws and regulations of every state and community where we do business. Conflicts of interest, bribery, and corruption have no place in our work. ACS values honesty and integrity in every aspect of business.

Highlighted topics:
› Conflicts of Interest
› Gifts and Entertainment
› Bribery and Corruption
› Political Activity
› Anti-Money Laundering
› Insider Trading

Conflicts of Interest

As an ACS employee, your primary business loyalty is to ACS. Conflicts of interest occur when something or someone we are personally involved with outside of work at ACS may interfere with our responsibilities to ACS. When we have a conflict of interest, it can affect our ability to act in the best interests of ACS when making business decisions.

To avoid conflicts of interest, we must avoid situations, investments, or personal relationships that create, or appear to create, a conflict between our interests and the interests of ACS. ACS prohibits employees from accepting money, gifts, or personal benefits in return for awarding ACS business.

Your role
If you are in a situation that appears to be a conflict, ask yourself the following questions:
·Will it interfere with my position at ACS?
·Will it compete against ACS interests?
·Am I using company resources or my employment position for personal gain?
·Might it appear to someone else that it is a conflict?
·Is my view partial or biased?

If you think you may have a conflict of interest, promptly disclose the potential conflict to the ACS leadership team. ACS will assess the situation and guide action.

Gifts and Entertainment

ACS employees do not accept or provide gifts, travel, or entertainment that may influence or appear to influence business decisions.

ACS employees should receive approval from ACS leadership before providing gifts or entertainment to a customer or government official.

Your role

Consider the following with a gift or entertainment activity:
- Be proactive in asking ACS leadership for guidance and approval.
- Gifts and entertainment must be legal and shouldn't be frequent or extravagant.
- Avoid gifts or entertainment activities that may create an actual or perceived conflict of interest.
- Know reporting requirements and limits on gifts and entertainment.

Bribery and Corruption

ACS has a zero-tolerance policy regarding bribery and corrupt activities. Bribery is unethical, illegal, and against ACS company values. ACS doesn't influence others by offering, paying, or receiving bribes or kickbacks or by any other means that would harm our reputation and core values of honesty and integrity.

Bribery and corruption can expose ACS and employees to litigation, fines, or imprisonment.

A government official is any:
- Individual elected or appointed to a governmental entity.
- Official or employee of a government.
- Official or employee of a company wholly or partially controlled by a government (such as state-owned companies).
- Candidate for political office.
- Political party or official of a political party, or person acting in an official capacity for any of the above regardless of rank or position.

Your role
- Be cautious of any invitation or solicitation to donate to a charitable cause that appears to be an exchange that results in additional business for ACS.
- Consult with ACS leadership if you have questions about a conversation, meeting, or interaction with a customer that may appear unethical.
- Be aware that any interactions with government employees or elected officials can be construed as influencing decisions, so understand the purpose of the conversation or meeting.

Political Activity

ACS supports and respects employees' rights to participate personally in the political process, whether by attending campaign events, school board meetings, or actively running for office.

ACS doesn't make corporate contributions to political campaigns. Since campaign laws are strict about using corporate resources to support or oppose a candidate, it's important to distinguish between personal and work-related political participation clearly.

ACS expects interactions with government officials to be conducted with integrity and compliance with laws and regulations. ACS expects political activity to be conducted on your own time.

Your role
- If participating in political activities, use your resources and non-work time. This includes using personal email, computer or phone, and office supplies.
- If your political activities require time from work, please contact the ACS leadership team.

Anti-Money Laundering (AML)

ACS is committed to preventing money laundering and financing terrorism. ACS customers in the banking, financial services, and insurance industry are subject to anti-money laundering programs, but as a company, ACS is not subject to AML regulations. Because some ACS customers fall under AML regulation, ACS requires our employees and engaged to complete the customer's (if applicable) required training in anti-money laundering and follow the customer's code of conduct in this area.

Your role
- As an employee engaged with a customer under an AML program, you must complete training provided by the customer in AML policies and procedures.
- Know customer AML policies and understand your specific role within the customer's division, department, or team.
- Understanding customer procedures for reporting red flags, suspicious activity, or possible violations.

Insider trading

It's against the law to purchase or sell securities if you have material, nonpublic information about those securities. It's also against the law to share that information with others or to recommend purchasing or selling securities based on that information.

ACS employees work with customers in the financial services industry or government sector. Working with customers may provide access to nonpublic information, or it may be shared with you for your work. In some instances, you may be required to sign a non-disclosure agreement; others may not.

ACS expects our employees to act with integrity in these situations.

Your role
- In any situation where the customer has shared nonpublic information, do not share it with ACS employees, colleagues, family, or friends.
- Do not provide any recommendation to anyone about purchasing or selling any securities.
- Do not purchase or sell stock or securities of any company when you have material, nonpublic information about that company.

Information Management and Security

Information is one of our most important company assets. We must maintain confidentiality, integrity, and availability for business activities, including compliance. We must also safeguard information against unauthorized use, modification, disclosure, or destruction.

Highlighted topics:
› Information Security
› Information Privacy
› Office Security
› Cybersecurity and Recovery
› Records Retention

Information Security

In today's world, threats, including cyber-attacks, come from around the globe. We're committed to protecting company, employee, and customer information and making sure it's accurate and available for employees who need it for legitimate business purposes. We protect information based on classification to ensure it is appropriately safeguarded.

Your role
- Access or attempt to access information and information systems only when authorized to perform your job duties.
- Share the minimum information needed for legitimate business purposes.
- Provide customers or third-party companies with ACS company information only when authorized to do so and after verifying their identity using current business area requirements.
- Classify and label company information appropriately so others know how to share, protect, and use it properly, regardless of format (i.e., digital or non-digital) or location.
- Protect information according to its classification and business purpose whenever and wherever you use it.
- Use only approved systems and methods for storing, sharing, and transmitting company information.
- Report any observed misuse or inappropriate activity.
- Complete required information security training.
- Formally acknowledge your responsibilities for appropriately protecting company information if required to do so.

Your actions can help protect the confidentiality, integrity, and availability of information and systems at ACS.
- Follow all customer information security procedures and promptly complete any required training.
- Create and maintain strong passwords; Don't share or reuse them across accounts.
- Use company-approved encryption solutions to send personally identifiable information securely.

- Use cloud solutions only when approved safeguards and agreements are in place.
- Access company email using approved processes and/or applications on approved devices.
- Don't click suspicious links or attachments in emails.
- Report known or suspected malware or phishing attacks to the ACS leadership team.
- Lock your devices and secure sensitive information even when leaving your workspace (including home) for brief periods.
- Secure equipment at the end of each business day when in public places or working from home.
- Appropriately dispose of paper documents and sensitive information according to ACS processes and procedures.
- Stay educated about the latest cyber risks and threats.

Information Privacy

We're committed to being good stewards of the personal information entrusted to us by our customers, workers, business partners, and others. We must ensure that all personal information under our care is handled lawfully, fairly, transparently, and securely.

ACS is committed to utilizing information security programs designed to protect our data and assets from external and internal threats. Our security strategy focuses on prevention, detection, and response based on proactive monitoring. We successfully maintain controls to protect our customers', candidates', and employees' data.

ACS Customers provide each consultant with a laptop with the appropriate login credentials accessed through the Customer VPN.

Third-party suppliers are part of our team for expert data administration and management for the ACS 401k, payroll, tax reporting, health, dental, disability, and life insurance. Each of the third-party suppliers has encryption and multi-factor authentication. ACS has a yearly review for select vendors to ensure the yearly data is valid and data security passes.

Although no best practice is guaranteed, the employees are trained to be alert to suspicious activity.

Your role
- Only collect necessary and appropriate information for your intended business purpose.
- Be transparent about how you intend to use the personal information you collect and only use it for that purpose.
- Take steps to keep personal information accurate, complete, and up to date.
- Use caution when disclosing, sharing, or providing access to personal information. Only share it with the individual's consent or as permitted or required by contract or law.
- Follow security procedures to encrypt sensitive personal information at rest and before electronic transfer. Anonymize or mask personal information wherever possible.

Office Security

The company has implemented controls designed to lock company workstations after an idle period.

The company has clean desk guidelines that advise employees to keep the workspace clear of paper containing sensitive data, which can prevent unauthorized users from gaining access to non-public information. Practices include not leaving documents containing sensitive data visible, unlocked, or unattended. Secure document shredders are provided at each desk for secure disposal (via cross-cut shredding) of confidential paper documentation. The final disposal for handling information is taken to Shred-it.

With a remote workforce, physical security brings new challenges. ACS has standards for all remote employees to follow to create a safer remote work environment. ACS encourages remote employees to evaluate their home office and implement the items below to enhance their physical security.
- Lock your doors when working remotely.
- Lock away work laptops when not in use.
- Never leave your devices or laptop in your vehicle.
- Don't use random thumb drives.
- Be vigilant while handling the organization's assets and data.
- Carry out a security check of your entrances and windows.
- Install extra cameras and alarms as needed.

Cybersecurity and Recovery

ACS does not store information on desktops or hard drives. The data that is sent to ACS is encrypted and immediately stored on the Cloud and Office 365. Microsoft strongly invests in systems, processes, and personnel to reduce the likelihood of personal data breaches and quickly detect and mitigate the consequences. Some of our investments in this space include:

Whenever access is granted, it is done under the principle of least privilege: permission granted for a specific request only allows for a minimal set of actions required to service that request. To do this, the Cloud and Office 365 maintain a strict separation between "elevation roles," with each role only allowing certain pre-defined actions to be taken. The "Access to Customer Data" role is distinct from other roles that are more commonly used to administer the service and is scrutinized most heavily before approval. Taken together, these investments in access control greatly reduce the likelihood that an engineer in the Cloud or Office 365 inappropriately accesses customer data.

Security monitoring systems and automation: The Cloud and Office 365 maintain robust, real-time security monitoring systems. Among other issues, these systems raise alerts for attempts to illicitly access customer data or for attempts to illicitly transfer data out of our service. Related to the points about access control mentioned above, their security monitoring systems maintain detailed records of elevation requests and actions taken for a given elevation request. The Cloud and Office 365 also maintain automatic resolution investments that automatically act to mitigate threats in response to issues we detect, and they have dedicated teams for responding to alerts that cannot be resolved automatically. To validate our security monitoring systems, The Cloud and Office 365 regularly conduct red-team exercises in which an internal penetration testing team simulates attacker behavior against the live environment. These exercises lead to regular improvements to our security monitoring and response capabilities.

ACS strives for continuous improvement with growth as a goal. We have not had material data security breaches.

Records Retention

ACS maintains policies and standards that address data privacy laws and regulations that apply to where we operate. The company's information security and cybersecurity are reviewed at least annually.

We keep personal information for as long as needed or permitted for which it was obtained. The criteria used to determine our retention periods for as long as we have an ongoing relationship as required by a legal obligation to which we are subject. When retention is over five years, files are moved to a secure off-storage environment.

We implement controls designed to safeguard candidate, employee, supplier, company, and customer information (collectively, "Information"), covering secure storage, handling, and data transmission.

Data is encrypted and securely transferred to a secondary location for recovery purposes. The company's backup and recovery are performed using industry-standard software.

Your role
- Retain and destroy records according to the records retention policy.
- Destroy records in a way that protects all confidential information.
- Suspend destruction when necessary due to document holds associated with litigation, government investigation, audit, or instruction from the general counsel.
- Don't alter, conceal, or destroy documents or records that are needed for an imminent or pending legal or regulatory action.
- Ensure appropriate oversight of record retention requirements when working with third parties that manage or retain records on behalf of ACS.

Fair Employment Practices

ACS is committed to providing a merit-based and non-discriminatory work environment where employees are treated equally and with respect and dignity regardless of demographic status or relationship to others in the organization. ACS follows all federal and state labor and human rights laws and regulations.

Anyone violating the following policies or procedures may be subject to disciplinary action, up to and including termination, or violator may be prosecuted under applicable local, state, or federal civil or criminal law.

Highlighted topics:
> › ACS Handbook
> › Labor and Human Rights
> › Diversity, Equity, and Inclusion
> › Discrimination

ACS Handbook

The ACS Handbook, also known as the Handbook, outlines expectations for employment and the appropriate policies, processes, and standards required for employment with ACS.

Every ACS employee and contractor receives the Handbook before the first day of employment and annually during employment. The employee must complete the acknowledgment page confirming they have read, reviewed, and understood the contents. The Handbook is available in digital and/or hard copy format. Contact the ACS leadership team immediately if you have not received the Handbook.
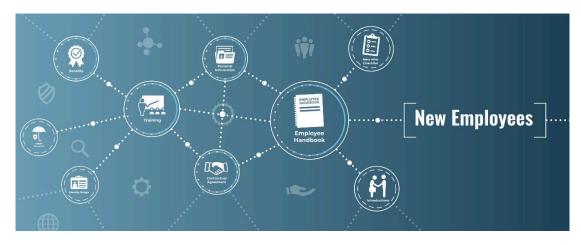
Your role
- Make sure you review and are familiar with your Handbook.
- Treat each other equally and with respect and dignity.
- Promote open communication and trust.
- Encourage an environment where each person feels safe and engaged.

Labor and Human Rights

ACS is committed to hiring and providing a voluntary workforce that adheres to all applicable labor laws. Any incidences that violate human rights, including human trafficking, slavery, forced labor, or child labor, will not be tolerated and may be subject to disciplinary action, up to and including termination.

ACS values principles focused on promoting, protecting, and supporting all internationally recognized human rights and avoiding involvement in human rights abuses. Our goal is to increase awareness of human rights in our relationships with our employees, customers, and communities.

Your role
- Maintain a work environment that reflects a respect for human rights.
- Be familiar with federal and state labor laws and internationally recognized human rights.
- Seek out sub-contractors whose human rights values are consistent with ACS's.
- Report any concerns or suspected instances of labor law or human rights violations to the ACS Leadership Team or the appropriate federal or state agency.

Diversity, Equity, and Inclusion (DEI)

ACS takes pride in hiring and retaining an outstanding, diverse group of extremely skilled and talented people in their professions. Our culture values diversity, equity, and inclusion (DEI) and is built on bringing unique talent together that represents our communities.

All ACS employees and contractors are valued and contribute to an environment of honesty, integrity, respect, and accountability in serving others. It is equally important to ACS that everyone feels physically and emotionally safe and part of the ACS team. We understand that collectively, our diverse perspectives and experiences create better results for our customers. We are united in positively impacting our local communities, country, and the world.

Your role
- Treat each other equally and with respect and dignity.
- Consider the impact of your actions on others.
- Seek out opportunities to better understand DEI in your community.

Discrimination

Discrimination is prohibited based on race, color, religion, creed, sex, national origin, age, disability, marital status, veteran status, or any other status protected by applicable law. Everyone has the right to work in a professional environment that promotes equal employment opportunities and is free from discriminatory practices, including harassment.

At ACS, we strongly believe that harassment and offensive conduct have no place in the workplace. This includes sexual harassment, which is an especially egregious form of discrimination that will not be tolerated by ACS.

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- Harassment is unwelcome verbal or non-verbal conduct, based upon a person's protected characteristic, that denigrates or shows hostility or aversion toward the person.
- Sexual harassment is a type of harassment that occurs when the verbal or non-verbal conduct described above is sexual in nature or gender-based.
- Offensive conduct may include but is not limited to, offensive jokes, slurs, epithets or name-calling, physical assaults or threats, intimidation, ridicule or mockery, insults or put-downs, rumors or gossip, obscene language, offensive objects or pictures, and interference with work performance.

Your role

- Make employment decisions or employment-related actions based on merit and ability.
- Treat each other equally and with respect and dignity.
- If you see something, say something. The ACS leadership team takes discrimination seriously.

Employee Safety and Security

At ACS, our employee's safety and security are of utmost importance. ACS is a virtual organization with the entire workforce working remotely in a home office or on-site with ACS customers. ACS ensures that all employees have access to policies and procedures to help safeguard their work environment.

Anyone violating the following policies and/or procedures may be subject to disciplinary action, up to and including termination, or [violator](#)s may be prosecuted under applicable local, state, or federal civil or criminal law.

Highlighted topics:
> › Health and Safety
> › Drugs and Alcohol
> › Work Environment
> › Emergency Management
> › Business Continuity

Health and Safety

ACS is committed to the health and safety of its employees. Everyone must follow health and safety policies and procedures, including an alcohol-free and drug-free work environment.

ACS will not tolerate violent or threatening behavior or any other activity that leads to an individual feeling unsafe, insecure, or fearful. These activities or actions can be written, spoken, or physical. They can include assaults, bullying or intimidation, stalking, or any other expression of hostility or aggression that puts a person's safety at risk.

ACS ensures compliance with all safety and security laws and regulations. It is strictly prohibited for any individual to possess any form of weapon at any company or customer location or during any work-related event, irrespective of whether or not they possess a license to carry a weapon. This policy is by local governing laws.

It's important to report all health and safety incidents, even if they seem minor, such as thefts, falls, or injuries. If unsure, contact the ACS Leadership team.

Your role
- Make health and safety a priority.
- Be familiar with all company and customer safety and security policies and procedures.
- If you believe you or someone else might be in danger, dial 911 immediately.
- Report any work-related safety or security concerns to the ACS Leadership team.
- Report all threats and suspicious activities, including but not limited to accidents, injuries, drug or alcohol abuse, and violent or threatening behavior, to the ACS Leadership team.
- Use the Remote Workspace Health and Safety Checklist for a safe environment.

Drugs and Alcohol

ACS is committed to providing a healthy and safe work environment, and the abuse of drugs and alcohol exposes the employee and ACS to risk.

Employees are prohibited from unlawfully consuming, distributing, possessing, selling, or using controlled substances while working. In addition, employees may not be under the influence of any controlled substance, such as drugs or alcohol, while at work, on company premises, or engaged in company business. Prescription drugs or over-the-counter medications, taken as prescribed, are exceptions to this policy.

ACS may require team members to undergo drug and alcohol testing, as permitted by law, in adherence to a customer's drug and alcohol policy.

Your role
- Seek help if you think you may have a drug or alcohol problem.
- Use good judgment when deciding to consume alcohol.
- Be open to family and friends if they express concern for your well-being.

If you need help with or information on addiction, please visit Find help for substance abuse | USAGov or by calling 1-800-662-HELP (4357).

Work Environment

In a remote work environment, employee safety and security are subject to individual needs and customer policies. Safety and security measures and equipment protect corporate data and other assets when employees do their jobs from remote locations such as a home office or when traveling for business.

ACS ensures that each employee is assigned the appropriate equipment and a VPN that only allows access to their customer's site. The ACS leadership team advises each employee on home office safety and security measures. When the customer requires an in-office presence, the ACS employee will follow the customer's safety and security policy.

Your role
- Be familiar with how to protect customer, company, and employee data.
- Use assigned company or customer equipment.
- Utilize multi-factor authentication for remote access to email, cloud/web apps, and networks, including third-party applications.
- Never use unauthorized devices such as flash drives to store data.
- Be familiar with the types of cyber-attacks, such as phishing scams.
- Never expose your login credentials in a public space.
- Immediately report to the Customers Security team and ACS Leadership team:
- Loss of equipment, passwords/ access codes, access key cards, or other security items.
- Visible circumvention, disabling, or destruction of security measures.
- Safety and security issues or concerns.

Emergency Management

ACS is committed to providing and maintaining a safe and healthy work environment; however, emergencies are always possible. Procedures are in place to address emergencies such as extreme weather events, fire, health emergencies, or any other emergency that puts the safety of our employees, subcontracted employees, and customers at risk.

As a remote workforce, all ACS employees and contractors should follow the procedures that are in place relative to their physical location.
- When in your home office, follow the emergency management procedures for your dwelling or use your best judgment in the absence of one. Then, follow the instructions of first responders.
- When the customer requires an in-office presence, the ACS employee or contractor must follow the customer's emergency management procedures. Then, follow the instructions of first responders.

Your role
- Make health and safety a priority.
- Keep your work area free of potential hazards.
- Be familiar with your home office environment and any emergency procedures that exist for your residential complex.
- Be familiar with the company's and customers' emergency procedures.
- When an emergency occurs, follow all applicable company and customer procedures as well as the instructions of first responders.

Business Continuity

Interruptions in business are inevitable. Because of this inevitability, ACS has a Business Continuity Plan that considers our employees, contractors, and customers, as well as consideration for our technology, data, and equipment. This plan will enable ACS to maintain essential functions when major business interruptions occur, such as cyber threats, natural disasters, and global lockdowns, thus protecting ACS's reputation, minimizing financial losses, and empowering employees and contractors to confidently complete their job tasks.

Your role
- Be familiar with the ACS BCP and its application to your role.
- Ensure your contact information, including your emergency contact person, is up-to-date.
- Report all occurrences that impact your ability to perform your role to the ACS Leadership team.

Brand and Reputation Management

Every interaction with customers, employees, and business partners leaves an impression and contributes to their perception of American Computer Services Inc.

Highlighted topics:
› Social Media Guidelines
› Logo Protection
› Copyright and Intellectual Property
› Ethics and Common Sense
› Confidentiality and Privacy
› Company Property
› Your Role

Social Media Guidelines

Our organization's reputation is intricately tied to the actions of our team members, encompassing both their verbal representation and the technology they employ to engage with customers.

Only authorized employees are allowed to create social media profiles or speak on behalf of ACS on social media platforms. It is important to note that when team members engage in social media activities and associate themselves with ACS, any statements, images, or material they post may be perceived as representative of ACS.

Logo Protection

The ACS logo is exclusively reserved for business-related activities and should not be employed to promote personal interests. This safeguard ensures that the logo maintains its association solely with the organization's official endeavors, mitigating potential confusion or misrepresentation. The ACS logo mustn't be featured on social networking sites or profiles.

This rule upholds control over the brand's visual identity and prevents unauthorized or inappropriate logo usage in online contexts. By adhering to these guidelines, we preserve the integrity and professionalism of the ACS brand, reinforcing its recognition and credibility in all interactions.

Company Property

It is imperative to adhere to company policies regarding company property, including equipment, vehicles, telephones, computers, and software. These resources are designated solely for company-related tasks and are not to be utilized for personal purposes. Unauthorized removal of company property from premises is strictly prohibited. Moreover, employees are expected to utilize company property for its intended purposes only. Upon termination, employees must return any company property in their possession. Computers, internet access, and emails are considered privileged resources and should be utilized exclusively for essential job-related functions.

Employees must refrain from downloading unauthorized software, files, or programs and seek supervisor approval before installing new software on company computers. Furthermore, duplication of files or programs stored on company computers for personal use is prohibited. Compliance with these guidelines ensures the responsible and efficient use of company resources.

Copyright and Intellectual Property

The following principles underscore the importance of respecting copyright and intellectual property laws and safeguarding ACS resources.

By upholding these principles, team members demonstrate a commitment to ethical conduct, legal compliance, and responsible stewardship of ACS's intellectual property and resources. This not only preserves the integrity of the organization but also fosters a culture of respect, trust, and accountability within the team.

Compliance with Copyright Laws

All team members must adhere to copyright laws and regulations when using or sharing copyrighted materials.
This includes obtaining proper permissions before using copyrighted content and giving appropriate attribution when necessary.

Respect for Intellectual Property

Team members should respect intellectual property rights by not infringing upon others' copyrights, trademarks, or patents.
This involves refraining from using proprietary information without authorization and respecting the rights of creators and innovators.

Use of ACS Resources

ACS resources, including intellectual property, must be used responsibly and according to organizational policies.
This entails avoiding the unauthorized duplication or distribution of ACS-owned materials and using resources efficiently to fulfill organizational objectives.

Protection of Confidential Information

Team members must safeguard confidential information belonging to ACS or its clients, ensuring that it is not disclosed to unauthorized individuals or entities.
This includes maintaining the confidentiality of proprietary data, trade secrets, and sensitive information.

Proper Attribution and Citation

Proper attribution and citation practices should be followed when using external resources or referencing third-party content.
This involves accurately acknowledging the source of information and crediting the original creators or authors.

Ethics and Common Sense

Truthfulness

Prioritizing honesty in communication is paramount, as it fosters trust, credibility, and integrity in all interactions. Conveying accurate information and avoiding misleading or false statements upholds ethical standards, strengthens relationships, and builds a foundation of trust. When honesty is prioritized, individuals and organizations establish themselves as reliable and trustworthy sources of information. This commitment to truthfulness contributes to transparent communication, facilitates effective decision-making, and cultivates a culture of integrity. By consistently prioritizing honesty in communication, individuals uphold ethical principles, maintain credibility, and foster positive relationships based on trust and respect.

Deliberate and Accurate Writing

Crafting messages with care to ensure clarity and accuracy is essential to avoid misunderstandings and foster effective communication. Rushed or careless communication can result in confusion, misinterpretation, and potentially damaging consequences. Therefore, it's important to take the time to articulate thoughts clearly, choose words thoughtfully, and provide sufficient context when needed. Additionally, verifying facts and information before communicating ensures accuracy and reliability, preventing the spread of misinformation. By prioritizing clarity and accuracy in communication, individuals can facilitate understanding, build trust, and mitigate the risk of misunderstandings or errors. This approach enhances the quality of interactions and contributes to stronger relationships and more successful outcomes.

Prompt Error Correction

Promptly acknowledging and rectifying mistakes is crucial for maintaining trust and credibility in any context. Transparency and accountability are foundational principles in fostering healthy relationships and effective communication. When errors occur, openly acknowledging them demonstrates integrity and a commitment to honesty. By promptly taking responsibility and implementing corrective actions, individuals and organizations can *mitigate* the negative impact of mistakes and rebuild trust with affected parties. Furthermore, embracing transparency throughout the process ensures that stakeholders are informed and involved in the resolution, ultimately strengthening trust and credibility in the long run.

Address Negative Content Respectfully

When encountering negative posts or misinformation, addressing them respectfully and constructively is essential. Correcting inaccuracies is crucial for fostering a more informed and productive discourse. Understandably, misinformation can spread easily, but by engaging with patience and providing accurate information, we can contribute to a more accurate understanding of the topic at hand. Let's strive to maintain professionalism and courtesy in our interactions, even when faced with opposing viewpoints or misinformation. By doing so, we can encourage meaningful dialogue and promote a culture of learning and mutual respect.

Conflict of Interest Disclosure

Transparency regarding conflicts of interest is fundamental in fostering integrity and trustworthiness in all interactions. By openly acknowledging potential biases, individuals can ensure that their communication and decision-making processes remain fair and unbiased. This transparency upholds ethical standards and strengthens relationships by demonstrating a commitment to honesty and accountability. Whether in professional settings, personal relationships, or public discourse, disclosing conflicts of interest cultivates an environment where decisions are made with integrity and trust is preserved. It serves as a cornerstone of ethical conduct and contributes to the maintenance of credibility and reliability in all aspects of life.

Confidentiality and Privacy

In any organizational setting, it's imperative to remain vigilant regarding the potential ramifications stemming from the inappropriate disclosure of personal or confidential information. Such breaches can inflict significant harm on individuals, customers, and the organization at large. For individuals, privacy violations can lead to feelings of vulnerability, loss of trust, and even identity theft. Customers may experience erosion of trust in the company, potentially resulting in lost business and damaging the brand's reputation. Moreover, for the organization itself, the fallout can include legal consequences, regulatory penalties, and a tarnished image in the eyes of stakeholders. Therefore, maintaining robust safeguards and adhering to strict protocols for handling sensitive information is paramount to mitigate these risks and uphold the integrity of individuals and the organization.

Possible damages:
- Defamation lawsuit.
- Copyright, patent, or trademark infringement claims.
- Privacy or human rights complaint.
- Workplace grievance under a collective agreement or unfair labor practice complaint.
- Criminal charges concerning obscene or hateful materials.
- Damage to the ACS's reputation and business interests.
- Be aware of laws that may apply to your use of social media.

Obtain Permission for Photography

Before photographing an individual for social media purposes, obtaining their permission to use the photo is essential. Communicate the photo's intended use and the channels to share it. Additionally, provide your contact information to allow for follow-up and address any concerns the individual may have.

Attribution for External Content

When sharing content from external sources or media outlets, it's essential to make a concerted effort to attribute the content properly. This entails tagging the original creator or clearly acknowledging the source. By giving credit where it's due, individuals demonstrate respect for the efforts of the original creator and uphold integrity in content-sharing practices. Proper attribution not only honors the

intellectual property rights of content creators but also enhances transparency and credibility in disseminating information. Moreover, it fosters a culture of ethical content sharing and encourages responsible behavior within online communities. Ultimately, by prioritizing proper attribution, individuals contribute to maintaining integrity and trust in the digital landscape.

Your Role

Media Inquiries

Any inquiries or questions from the news media or other organizations should be directed to the ACS leadership team. This ensures that responses are coordinated and aligned with the organization's messaging and objectives.

Interview Requests

In the event of an interview request or a request to represent ACS, employees must first seek approval from the ACS leadership team. Only designated representatives authorized by the leadership team are permitted to conduct interviews on behalf of the company.

Social Media Representation

Only specific employees are authorized to create social media profiles for ACS or represent ACS on social media platforms. Team members must understand that their actions on social media may be perceived as reflecting the views of ACS as a whole, necessitating adherence to specific social media guidelines provided by the organization.

Transparency and Accountability

Employees are expected to be honest about their identity when engaging on social media and to make it clear that any opinions expressed are their own. This promotes transparency and avoids potential confusion regarding individuals' affiliation with ACS.

Sustainability

At ACS, our sustainability mission follows environmental, social, and governance (ESG) elements important to our company, employees, and customers. Understanding ESG and its associated risks allows ACS the opportunity to promote a positive impact on the environment and the local communities we all cherish.

Highlighted topics:
> Environment
> Social
> Governance
> Giving Back

Environment

ACS deeply understands our impact on the environment and its effect on our local communities and the world. That is why we insist our company, employees, customers, and business partners be good stewards of the earth.

ACS has already made strides with our environmental impact by implementing a virtual office and having employees work from their home offices. The use of self-reporting carbon calculators has shown that this change has had an estimated yearly carbon footprint reduction of 75 metric tons of CO_2e. We utilize business partners who employ "green shipping" strategies and technologies such as Electric Vehicles to further reduce our carbon emissions. Fossil fuel usage has been reduced to between 15 and 20 gallons per person for work each week. An average annual savings of approx. 21,00 gallons of fossil fuel, resulting in savings for the Iowa-based staff of approx. $80,870 yearly.

Daily meetings, interviews, and client communication with ACS are conducted via online technologies, including Zoom or Microsoft Teams.

ACS recycles technology products and paper products. Our technology partner refurbishes old laptops, phones, and printers to donate or sell for future use.

ACS avoids paper usage by sending electronic quotes, payroll remittances, and invoices. Employee payroll remittance is all processed with ACH, thus avoiding physical checks.

ACS programs and initiatives reduce global greenhouse gas (GHG) emissions and increase energy efficiency. The ACS Leadership team evaluates these programs and initiatives annually to ensure their continued suitability, adequacy, effectiveness, and progress toward GHG emission reduction targets.

Environmental goals
- Carbon Neutral by 2050.
- EPA Recycling Compliant by 2050.
- 100% paper-free by 2050.

Your role
- Turn off the lights when you're not using them.
- Change all light bulbs to LED.
- Use a reusable water bottle and coffee mug instead of plastic bottles and paper cups.
- Minimize printing whenever possible.
- Don't use Styrofoam food containers.
- Recycle waste and properly dispose of business and household items through recycling centers.

Social

ACS promotes diversity, equity, and inclusion (DEI) and is committed to a workplace where all employees are guaranteed equal employment opportunities. This commitment requires an objective hiring and selection program based on candidates' academic, personal, and professional qualifications and the company's needs. Candidates for open positions should be assessed rigorously and objectively based on their professional merits.

Social goals
- Practice sustainability.
- Prioritize more recycling.
- Corporate donations to local charities.
- Match employee donations to charities they feel strongly about.
- Encourage volunteering and giving.
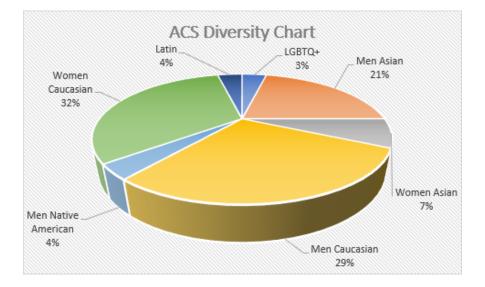- Reenforce employee training and performance rewards.

Your role
- Be inclusive of all ideas and perspectives.
- If you're hiring, engage with our Talent Acquisition team to learn how to mitigate bias during the interview process.
- If you're searching for a new supplier, consider diverse suppliers in your candidate slate.
- If you are implementing new processes, keep accessibility and inclusion in mind.

ACS Diversity Chart

- Latin 4%
- LGBTQ+ 3%
- Men Asian 21%
- Women Asian 7%
- Men Caucasian 29%
- Men Native American 4%
- Women Caucasian 32%

Governance

Good governance serves as the cornerstone of any sustainable business, a truth that resonates profoundly within our company. Given the pivotal role public trust plays in our success, we are unwavering in our commitment to enhancing the efficacy of our governing policies. Our endeavors are steadfastly directed toward fostering ethical behavior and nurturing transparency throughout our organization. Central to this mission is the diligent protection of customer and employee data, fortified by implementing robust safeguards. Furthermore, we prioritize the annual training of all staff members on our Code of Conduct and ACS Handbook, thereby reinforcing our collective dedication to upholding the highest standards of integrity. Additionally, we remain steadfast in our dedication to providing avenues through which our employees can voice any concerns they may have, thereby fostering an environment of openness and accountability.

ESG
ENVIRONMENT   SOCIAL   GOVERNANCE

Giving back

To ACS, giving back isn't just financial. It's the dedication to our community and the communities of our remote employees and customers. ACS has encouraged and supported its employees and customers' efforts to give back to their communities and positively influence society.

Serving Our Community

ACS encourages volunteering at non-profits and supporting local small businesses. Each year, ACS and its employees participate in organizations that support their community, including their public schools.

Food Insecurity

ACS recognizes the impact of food insecurity on individuals and families of all backgrounds. Each month, ACS donates to the Central Iowa Food Pantry to purchase food for these families.

Children's Winter Clothing Drive

ACS understands the importance of education and its positive impact on children. Getting to and from school is critical to learning, so ACS has partnered with underserved elementary schools to provide winter coats, gloves, hats, boots, and blankets so the children can attend class safely during the cold Iowa winters.

Cancer Research

Cancer has impacted everyone's lives in some way, and fighting cancer is important to ACS. We donate each year to the St. Jude Hospital for children's cancer research to help find a cure.

Veteran and First Responders

ACS believes it is important to take care of Disabled Veterans and Emergency Responders who have lost their ability to work, their place to live, and their ability to keep their families together. ACS donates to the Tunnel to Towers Foundation, which provides specially adapted smart homes for catastrophically injured veterans and first responders.

How do I report suspected violations?

The Code, along with ACS policies and applicable laws and regulations, forms the backbone of our responsibilities to each other, our customers, and other partners. A question or concern may arise that requires clarification, or you may be confronted with a situation of which ACS should be aware. ACS values honesty, integrity, and respect, so we should always speak up to ask questions or report issues with appropriate urgency.

ACS has leadership with the skills and resources to investigate situations to determine if a violation has occurred. Prompt reporting may allow our company to avoid or mitigate serious harm to our business or others.

Contacts

There are multiple options for reporting your concerns if you suspect unethical or fraudulent activity. You can reach out to:

- Your leader
- Member of Human Resources
- Email: contact@acs-team.com
- Call 515.251.7340 and speak with a member of the ACS leadership team

If you have questions about this Code or a specific policy, you may:

- Use any of the options listed above

For matters covered in your ACS Handbook:

- Call 515.251.7340 and speak with a member of the ACS leadership team

When a report or inquiry is made, the Company will respond promptly and appropriately, and all reports and inquiries will be treated confidentially to the extent possible. If you do not feel comfortable speaking to one of the Company's internal resources listed above, you may always use our external hotline, which is operated by an independent third party. When you call the hotline, a specially trained representative will listen to your concerns, ask you a few questions, and review the information with you to ensure it is accurate. You may use the external hotline to report any matter anonymously, as permitted by applicable local law.

ACS ensures that all investigations are conducted consistently, comprehensively, and confidentially (to the extent possible) in accordance with applicable laws. When an investigation is completed, the Company will take appropriate corrective or disciplinary action in accordance with local laws and internal policies and procedures. You may be updated on the actions taken to resolve your report in appropriate situations.

Questions or Concerns

If you have any questions or concerns, you may:
- Call 515.251.7340 and speak with a member of the ACS leadership team.
- Email: contact@acs-team.com