

For People, By People



# Atlas HXM

# Code of Conduct

January 2026





## A Letter from Our CEO

Hi Atlas HXM,

We are simplifying global expansion for our customers via our direct Employer of Record business model and a streamlined technology platform. We are changing the world for them as they know it.

We uphold this Code of Conduct because making decisions and taking actions in a lawful, ethical, and responsible way is, I believe, the best way for us to do business. It helps us to positively impact all our stakeholders – our investors and shareholders, customers, business partners, vendors, the environment, and communities in which we operate, and each other as employees. In turn, we see stakeholders drawn to work with us because we take ethics and compliance as seriously as we do.

**James "Jim" McCoy**

Atlas HXM Chief Executive Officer



# Table of Contents

<b>Introduction</b>	<b>4</b>	Sanctions Anti-Money Laundering & Counter Terrorism Financing Anti-Modern Slavery Child Safeguarding
Who does the Code of Conduct apply to?		
Policies & Procedures		
Interpretation		
<b>Mission, Vision &amp; Values</b>	<b>6</b>	
Our Mission		
Our Vision		
Our Values		
<b>Roles &amp; Responsibilities</b>	<b>7</b>	
All Employees		
Management & Leadership		
Atlas HXM's Ethics Line		
<b>Culture of Respect &amp; Professionalism</b>	<b>10</b>	
Occupational Health & Safety		
Diversity, Equity, Inclusion & Belonging		
Anti-Discrimination, Anti-Harassment & Anti-Bullying		
Anti-Sexual Harassment		
Zero Violence		
Alcohol & Drug Use		
<b>Risk, Compliance &amp; Privacy Culture</b>	<b>12</b>	
Enterprise Risk Management		
Privacy & Data Protection		
Information Security		
Anti-Bribery & Anti-Corruption		
Gifts, Entertainment & Hospitality		
Competition & Anti-Trust		
<b>Culture of Ethics &amp; Responsibility</b>	<b>15</b>	
Accounting & Financial Reporting		
Business Records		
Remuneration		
Conflicts of Interest & Related Party Business Dealings		
Insider Trading & Material Nonpublic Information		
Company Assets & Resources		
Confidential Information		
Employee Work Product		
Community, Professional & Political Involvement		
External Communications		
Social Media		
Environmental Social Governance		
<b>Administration</b>	<b>20</b>	
Ownership		
Amendment		
Investigations		
Reporting to Authorities		
Enforcement		
No Retaliation		
Waivers		
No Creation of Rights		



# Introduction

This is the Code of Conduct of Atlas Technology Solutions, Inc. and our subsidiaries (**Atlas HXM**) around the world.

Atlas HXM's mission is to simplify global expansion – to show our customers a vision of a borderless world. This is only possible if we operate lawfully, ethically, and responsibly.

We believe supporting these behaviors not only creates a great company to work at, but also a company that is incredible to work with, whether as a shareholder, customer, business partner or vendor, and a company that positively impacts the world.

The purpose of this Code of Conduct is to set out the corporate culture our company seeks to uphold, both to guide our employees and to offer our shareholders and customers an insight into our company.



## Who does the Code of Conduct apply to?

This Code of Conduct applies to employees, contractors, executive officers, directors, and local directors of Atlas Technology Solutions, Inc. and our wholly or majority owned and controlled subsidiaries. This Code of Conduct applies to any situation where an employee is representing Atlas HXM, which may include hours and locations outside of standard work practices.

References to “employees” should be taken to include contractors, non-executive directors, and local directors, as far as is reasonably possible given the absence of an employment relationship between Atlas HXM and those persons.

In compliance with applicable laws and regulations, applicable provisions of our Code of Conduct will be included in our contracts with customers and third parties.

## Policies & Procedures

The Atlas HXM Code of Conduct is in addition to Atlas HXM’s company policies and procedures. In the event of a conflict between the Code of Conduct and any policy or procedure, the Code of Conduct will prevail. Any inconsistency between this Code of Conduct and local laws and regulations should be resolved in favor of local law.

### Interpretation

#### Who is an employee?

Employee means any person with an employment relationship with Atlas HXM as defined by local law.

#### Who is an executive officer?

Executive officer or Executive Team means the persons nominated to be the executive officers of Atlas Technology Solutions, Inc. by the Chief Executive Officer, including the Chiefs and General Managers.

#### Who is a director?

Director or Board of Directors means the persons nominated to be directors of Atlas Technology Solutions, Inc. by the Chief Executive Officer.

#### Who is a local director?

Local director means a director of a wholly or majority owned and controlled subsidiary of Atlas Technology Solutions, Inc.



# Mission, Vision & Values

Atlas HXM's Code of Conduct gives effect to our mission, vision, and values.



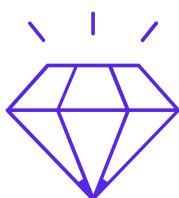
## Our Mission

To guide companies on their growth journeys with software and solutions that enable global talent management.



## Our Vision

We see a future where growth thrives across borders and cultures.



## Our Values

### Passion

Purpose-driven: We are driven by our passion and engage in everything we do.

### Influential Innovation

Value creation: We challenge the status quo to re-imagine and anticipate the needs of the market.

### Trust & Diversity

Human-centric: We celebrate diverse perspectives and foster an environment of trust and accountability.



# Roles & Responsibilities

## All Employees

All employees must:

- Be familiar with the Code of Conduct, company policies and procedures, applicable laws and regulations, and Atlas HXM's values.
- Comply with the Code of Conduct, company policies and procedures, and applicable laws and regulations wherever Atlas HXM does business, and uphold Atlas HXM's values.
- Complete mandatory trainings.
- Exercise good judgment based on the principles of lawfulness, ethics, and responsibility, especially in circumstances not envisaged and covered by this Code of Conduct.
- Seek advice and guidance from management or leadership, Risk & Compliance, or Human Resources (as relevant), if they have any questions or concerns.
- Report suspected non-compliance with the Code of Conduct, company policies and procedures, or applicable laws or regulations, to management or leadership, Risk & Compliance, Human Resources, or via Atlas HXM's Ethics Line (as relevant).
- Raise an issue if they feel under pressure to cut a corner or likely to make an error, perhaps due to processes, incentives (i.e., bonus structures), or time-pressures and workload.
- Cooperate fully with any investigation by giving timely, accurate, and full evidence.
- Not retaliate against anyone for raising an issue or concern, making a report or their involvement in an investigation.



## Management & Leadership

In addition, employees in positions of management or leadership across Atlas HXM must:

- Demonstrate lawful, ethical, and responsible decision making and behavior.
- Give employees advice and guidance on the Code of Conduct and company policies and procedures, ensuring they have access to resources they need to help them comply.
- Create an environment of psychological safety where employees feel comfortable asking questions, raising concerns, and reporting suspected non-compliance.
- Set incentives, timeframes and workloads that encourage ethical and lawful behavior, and design processes to reduce opportunities for human error.
- Take seriously any report of suspected non-compliance raised by an employee.
- Take reasonable measures to detect and deter misconduct.
- Take preventative, corrective, or disciplinary action when someone is determined to have violated the Code of Conduct, including identifying and addressing systemic causes.
- Recognize and reward lawful, ethical, and responsible behavior.



## Atlas HXM's Ethics Line

Employees have a responsibility to report if they believe or suspect a violation of the Code of Conduct, company policies or procedures, and / or applicable laws or regulations has occurred, is occurring, or may occur.

Employees can make such reports to management and leadership, Risk & Compliance, or Human Resources (as relevant).

Another way employees can report is via Atlas HXM's Ethics Line:

**Website:** [www.integritycounts.ca/org/Atlas](http://www.integritycounts.ca/org/Atlas)

**Toll free phone:** 1-866-921-6714

**E-mail:** [Atlas@integritycounts.ca](mailto:Atlas@integritycounts.ca)

Persons (other than employees) with a connection to Atlas HXM may also be able to make reports of suspected or actual violations of the Code of Conduct and / or applicable laws or regulations to Atlas HXM's Ethics Line.

All reports will be treated seriously and confidentially.

Unless local law requires otherwise, reporting persons may remain anonymous, but we do encourage such persons to leave their contact details so that Atlas HXM may more effectively and efficiently investigate their report.



# Culture of Respect & Professionalism

Atlas HXM respects its employees and acts towards them with professionalism. In turn, Atlas HXM expects our employees to respect and treat each other professionally. What do we mean by respect and professionalism? We mean timely consultation and concise communication across our company. We mean openness and honesty. We mean kindness and appropriate tone when communicating. We mean accountability and responsibility. We mean lending a hand and working as a team. We mean punctuality. We mean going beyond compliance with workplace laws to truly see our employees and have them see each other as whole people with lives, hobbies, hopes, and dreams.

Why do we so adamantly go beyond the letter of the law? Atlas HXM has a purpose and a vision to achieve a borderless world, and that vision is only achievable when our employees feel seen and known, engaged, and included within that vision, and choose to invest their energy and effort into realizing it together.

## Occupational Health & Safety

Atlas HXM is committed to protecting the health, safety and wellbeing of our employees and visitors, and complying with applicable health and safety laws. We cannot do this alone though – it is a mutual commitment. Employees and visitors must follow specific rules and instructions that Atlas HXM publishes and trains upon, and act reasonably to protect themselves and others from harm. Please raise any health and safety issues or concerns, and immediately report any health and safety incidents, to [Human Resources](#).

## Diversity, Equity, Inclusion & Belonging

We believe in diversity, equity, inclusion, and belonging (DEIB) for every difference, such as nationality, culture, religion, age, gender, sexuality, pregnancy status, and mobility status. Each and every employee is included and belongs. We strive to approach DEIB systemically across the entire employment lifecycle – including employing people globally, enabling flexible work, adapting workplaces, accommodating physical and mental differences, eliminating unconscious bias, and closing the gender pay gap. We cherish a culture where diversity is embraced, and the diverse ideas and perspectives of all of our employees can flourish – this is when Atlas HXM soars.



## Anti-Discrimination, Anti-Harassment & Anti-Bullying

We want everyone to feel safe, protected, and respected, and to know wellness. For this reason, Atlas HXM does not tolerate any form of harassment, discrimination due to perceived or real difference, or bullying – whether physical, psychosocial, virtual, or another form. This is the case regardless of whether local law makes harassment, discrimination, or bullying illegal.

### Anti-Sexual Harassment

Sexual harassment is an insidious form of harassment because it goes further than invading someone's emotional and physical integrity to their sexual agency. Atlas HXM seeks not just to redress such harms, but to positively prevent them.

### Zero Violence

Atlas HXM has zero tolerance for any form of violence or abuse (or threats of such) within our workplaces, or for employees facing violence or abuse (or threats of such) as they carry out their work – whether in interactions with employees, customers, or third parties. Any violence or abuse (or threats of such) must be reported immediately

to Human Resources. The employee should be assisted with obtaining any necessary medical assistance. Subject to local law, Atlas HXM will work with the employee to determine if they would like to report the matter to local authorities, respecting their decision.

We can also support our employees, such as through flexible work arrangements and access to leave entitlements, in the unfortunate circumstance that they face domestic violence or abuse.

### Alcohol & Drug Use

Where legal and culturally appropriate, alcohol may be served at Atlas HXM's events. Responsible consumption of alcohol by those of legal drinking age is permitted. Intoxication, however, is not an excuse for improper conduct. Using or being under the influence of illegal substances is absolutely prohibited. Subject to medical exceptions, being under the influence of any legal substance may be the subject of corrective or disciplinary action if it affects an employee's performance.



# Risk, Compliance & Privacy Culture

Atlas HXM is built on a foundation of risk management, compliance, and privacy. Enterprise risk management, operationalized compliance, and privacy by design and default create a better company for investors, customers, and employees alike, as well as the communities within which we operate. This is because the control and organization they demand cause a company to optimize itself from the boardroom, through and across departments, and into each role within our company. This strategic view of risk management, compliance, and privacy is our competitive advantage because not only does it make us a more agile company, but it also enables us to race ahead of our competitors when they are inevitably forced to stop to address issues.

Implementation starts and ends with the tone from the top. Atlas HXM is committed to complying with all applicable laws and regulations wherever we operate, to honoring the terms and conditions of agreements we enter and upholding our Code of Conduct and company policies and procedures. We onboard employees into this culture and equip them to perpetuate it by ensuring risk management, compliance, and privacy are visible and trained upon, and the answers to questions are readily available. Compliance with laws is an intrinsic part of all employees' roles and responsibilities, and every employee must know how to identify and raise risks, compliance, and privacy issues to Risk & Compliance for resolution.

## Enterprise Risk Management

Atlas HXM assesses, remediates, and monitors risk at an enterprise level using a framework aligned with global industry standards. Through enterprise risk management, Atlas HXM regularly reviews overarching companywide risks and department and jurisdiction specific risks. Atlas HXM recognizes the importance of ensuring our third party ecosystem operates in alignment with privacy, anti-corruption, sanctions, anti-money laundering and anti-slavery laws and regulations.

## Privacy & Data Protection

Atlas HXM is committed to safeguard the confidentiality, integrity, and availability of the personal data we handle. We do so by following applicable data privacy and protection laws and regulations in all jurisdictions. If we operate in jurisdictions with less onerous requirements than the EU General Data Protection Regulation, Atlas HXM strives to uphold its principles there to the greatest extent possible. Employees must be able to recognize and abide by all privacy requirements in processes and keep up to date with all data protection training. Employees are expected to recognize data subject access requests and data breaches and immediately report them to **Risk & Compliance**, so Atlas HXM may address any such incidents promptly and within any applicable timeframes.



## Information Security

The information security framework at Atlas HXM represents our present and future efforts to implement the principles and requirements of information security frameworks, such as ISO27001, SOC 2 and NIST CSF. Atlas HXM's Human Experience Management platform has certifications for ISO27001, ISO27017 and ISO27018.



Employees are responsible for upholding the security of our information and systems, including being vigilant about day-to-day information security (e.g., password hygiene, locking devices in their possession, phishing awareness, and exercising caution in accessing the internet). Employees are responsible for understanding and complying with Atlas HXM's acceptable use standards to ensure they are aware of the controls in place to protect Atlas HXM's information and systems.

## Anti-Bribery & Anti- Corruption

Atlas HXM stands against bribery and corruption as they are unethical and illegal practices. Atlas HXM expects employees to refrain from engaging in any form of bribery or corruption irrespective of location. Employees are prohibited from offering, giving, or promising anything of value to, or receiving anything of value from, any current or prospective customer or third party with the intention of inducing or rewarding the improper performance of an activity

connected to our business. Employees must abide by all applicable anti-bribery and anti-corruption laws, including the USA Foreign Corrupt Practices Act.

## Gifts, Entertainment & Hospitality

In limited circumstances, as per Atlas HXM's guidance on gifts, entertainment, and hospitality, employees may give or receive business gratuities that comply with applicable anti-bribery and anti-corruption laws. Employees can contact **Risk & Compliance** with any questions.

## Competition & Anti-Trust

Atlas HXM believes in free, open, and fair competition between companies across the markets in which we operate. We comply with competition and anti-trust laws and regulations. Employees must be very careful not to engage in discussions with persons outside of Atlas HXM that may lead or amount to a violation of these laws, such as agreements to unfairly restrict competition. Employees must not make misleading or deceptive statements about Atlas HXM's products or services, or those of our competitors. Employees must respect the confidentiality of our competitors' trade secrets.

Whilst Atlas HXM seeks knowledge about our competitors, we will not engage in illegal acts to acquire it. Employees will not be expected or asked to divulge confidential information from their prior employment, nor will Atlas HXM pressure competitors' customers or vendors for confidential information.



## Sanctions

Atlas HXM is committed to complying with all sanctions applicable to our operations. Atlas HXM stays abreast of the various forms that sanctions take, the authorities that administer and enforce sanctions, the lists those authorities publish of persons, organizations, and countries whom we must not do business with, and whether we require any license or exception. Atlas HXM is acutely aware of sanctions imposed by governments where we are headquartered and have entities. Employees must report any actual or suspected sanctions evasion to **Risk & Compliance**.

## Anti-Money Laundering & Counter Terrorism Financing

Reputable international companies are natural targets for international crime. Atlas HXM has put in place mechanisms for identifying and thwarting efforts to launder money and finance terrorism. Atlas HXM calls upon all employees to be our eyes and ears, reporting to **Risk & Compliance** any actual or suspected money laundering or terrorism financing.

## Anti-Modern Slavery

Atlas HXM stands against modern slavery and human trafficking by striving to ensure it is removed from our supply chains and being vigilant against our company being used as a vehicle for such illegal and abhorrent practices. Employees are expected to remain diligent of the possibility of slavery and trafficking and report any actual or suspected exploitation to **Risk & Compliance**.

## Child Safeguarding

Atlas HXM strives to ensure that children are safeguarded within our company by prohibiting child abuse, exploitation or neglect, promoting child-safe screening procedures, and investigating and responding to reports. Employees are expected to remain diligent and report any actual or suspect child abuse, exploitation or neglect to **Risk & Compliance**.



# Culture of Ethics & Responsibility

Beyond lawfulness, Atlas HXM has a culture of ethics and responsibility that defines our reputation and place within the market amongst investors and with government. We cannot operate without being known for this. We are transparent in our accounting, financial reporting, and record keeping. We eradicate any hint of misalignment between the interests of our employees and those of the company. We are stewards of our confidential and proprietary information. Our employees are encouraged to engage responsibly and respectfully in the community and politics. External communications are undertaken in a timely, accurate and honest manner. The capstone to our relationship with the market, and the communities in which we operate, is our commitment to Environmental Social and Governance best practices.

## Accounting & Financial Reporting

Atlas HXM abides by applicable laws and regulations, as well as following generally accepted international standards across all aspects of accounting and financial reporting. Whether communicating to the public, private parties or authorities, Atlas HXM takes actions necessary to ensure timely, complete, accurate, and understandable disclosures about our financial position as is lawful and ethical.

## Remuneration

Atlas HXM adheres to laws and regulations about remuneration, including about pay transparency and collective bargaining agreements. Atlas HXM takes into consideration local market rates, attracting and retaining talent, and employee engagement and incentivization. We seek to structure remuneration and incentivization responsibly to drive lawful, ethical, and responsible decision making and behavior in our employees. Crucially, Atlas HXM also strives to keep the gender pay gap firmly closed.

## Business Records

Atlas HXM makes and maintains timely, complete, accurate and understandable business records. Atlas HXM endeavors to retain all business records in accordance with applicable laws and regulations, including about retention periods, statutory limitation periods, holding records for investigation, arbitration and litigation, format, system and location, and data minimization. Atlas HXM relies upon employees to uphold this commitment. Employees are prohibited from prematurely destroying records.



## Conflict of Interest & Related Party Business Dealings

Atlas HXM makes business decisions in the best interests of the company. A conflict of interest may arise where an employee is unable to perform their role and responsibilities objectively and/or fully, or the employee or their relative obtains an improper personal gain from information, relationships, or opportunities that come to the employee through their relationship with Atlas HXM. Actual, potential, and perceived conflicts must all be recognized and avoided.

### Who is a relative?

**Relative means: a partner or spouse, ex-partner or ex-spouse; a parent, sibling, child, niece or nephew, or grandchild; and a parent, sibling, child, niece or nephew, or grandchild of a partner or spouse, or ex-partner or ex-spouse.**

Conflict of interest situations often arise in the following areas:

- Using company name, relationships, confidential or proprietary information, or corporate opportunities for personal interest.
- Significant use of company time, assets or resources for personal interest.
- Starting a business that competes with Atlas HXM or taking on a board position or outside employment with a company that competes with Atlas HXM.
- Outside employment that inhibits an employee's ability to do their job properly, such as "moonlighting".
- Employing or recommending a relative without declaring the relationship.
- Using one's position in the company to influence decisions to engage vendors in favor of a company an employee or their relative owns or has an interest in, without declaring the relationship.
- Influencing decisions to engage vendors to receive business gratuities.

Employees must disclose any current or potential related party business dealings to **Risk & Compliance**. If an employee is in a business, professional, or personal situation that may create a conflict of interest, they must discuss it with **Risk & Compliance**.

Atlas HXM will not make any personal loans to any director or executive officer of Atlas HXM.



## Insider Trading & Material Nonpublic Information

Material nonpublic information is information that has not been made public and is reasonably relevant to the decision to buy, sell, or hold a share. In the course of employment with Atlas HXM, employees may become aware of material nonpublic information about Atlas HXM or other companies, such as our customers, partners, vendors, or investors. Employees must neither trade the shares of relevant companies whilst aware of material nonpublic information nor provide this information to anyone else so that they might do so. This is known as insider trading.

## Company Assets & Resources

Atlas HXM entrusts employees with assets and resources (both tangible and intangible) to undertake their role and responsibilities, which employees must use properly and take reasonable steps to protect from loss, theft (including hacking), damage, and waste. Employees may give limited personal use to Atlas HXM's assets and resources. In doing so, employees must exercise good judgment and ensure all uses (especially materials sent or received) are respectful of others. All information on Atlas HXM's systems may be accessed in accordance with Atlas HXM's system of internal access controls. Anything created, received, sent, or stored on Atlas HXM's systems is generally considered Atlas HXM's property.

## Confidential Information

Atlas HXM protects our confidential information, intellectual property, and proprietary information (all **confidential information**). Atlas HXM relies upon all employees to uphold the measures we have put in place to restrict access and secure our confidential information. All confidential information is shared on a need-to-know basis – employees must not share confidential information with anyone who is not authorized to receive it. We must be vigilant not to inadvertently share confidential information, such as leaving it out in the office, in a photo posted to social media, or during a conversation with a colleague in public. Confidential information may only be shared outside of our company subject to a non-disclosure agreement. Similarly, employees must protect the confidential or copyrighted information of others and must not use it in their work for Atlas HXM.



## Employee Work Product

To the greatest extent possible under applicable law, all inventions, discoveries or works of authorship created, generated, or obtained as part of or arising out of an employment relationship with Atlas HXM is and remains the exclusive property of Atlas HXM. Employees must disclose and assign to Atlas HXM all such proprietary rights and interests.

Laws and regulations may prohibit or regulate company contributions to political candidates, political parties, or party officials. If Atlas HXM engages in the political process, it will do so in full compliance with applicable laws. Only the **Chief Executive Officer** may make decisions about political contributions on behalf of Atlas HXM. Any personal political contributions by employees in their personal capacity should be made in accordance with applicable law, which may include reporting.

## Community, Professional & Political Involvement

Atlas HXM encourages each of its employees to be good citizens and to fully participate in their community, professional activities, and the political process. Employees who participate in such activities are doing so as individuals and not as representatives of Atlas HXM. Employees must make every effort to ensure that they do not create the impression that they speak or act on behalf of Atlas HXM.

Atlas HXM may sponsor a community or professional activity or authorize an employee to represent Atlas HXM at such an event. Atlas HXM also encourages its employees to participate in professional activities, such as speaking engagements, membership of industry associations, conferences, functions, events. Atlas HXM is proud to have programs where employees can volunteer and make charitable donations. We also encourage employees to volunteer beyond this and make charitable donations to their own charities of choice. Atlas HXM itself may also make charitable contributions.

## External Communications

External communications require special care and attention. Only authorized persons may respond to government, investors, and media requests and queries on behalf of Atlas HXM. Please refer:

- Government requests to **Legal, Finance or Risk & Compliance** (as relevant).
- Queries from investors, or about investors or investments, to the **Chief Executive Officer**.
- Media and press related queries to the **Chief Executive Officer** (or their official delegatee for this purpose).

If an employee inadvertently communicates with one of these external parties, they must report this as soon as possible to the relevant person or team.



## Social Media

Employees must use good judgment when engaging on social media generally, interacting in a legal, ethical, and responsible way, as we are all accountable for what we do and say on social media.

Atlas HXM welcomes all employees positively promoting Atlas HXM via their professional social media accounts. If employees come across incorrect or misinformation about Atlas HXM on social media, they should refer this to **Marketing**, and not engage with it.

## Environmental Social Governance

The capstone to our Code of Conduct is our vision to embody Environmental Social and Governance (ESG) best practices. We believe this is ethical and responsible and increasingly lawful, and the practices they encourage enhance our performance.

**Environmental** – Atlas HXM is dedicated to being a good steward of the environment by reducing energy consumption and waste, recycling, and seeking to host our offices in sustainably certified buildings.

**Social** – Our social responsibility is exemplified in our diversity and inclusion, focus on wellness, and opportunities to give back through charitable giving and volunteering.

**Governance** – As demonstrated in our Code of Conduct, Atlas HXM is committed to upholding the highest standards of ethics and corporate governance, with a view to guarding the trust and confidence of our investors, customers, and employees.



# Administration

## Ownership

**Risk & Compliance** has ownership and is responsible for administration of this Code of Conduct under the direction of the Executive Team and the Board of Directors.

## Amendment

This Code of Conduct will be reviewed periodically and may be amended from time to time. Non-material amendments may be made by **Risk & Compliance**. Material amendments must be approved by the **Chief Executive Officer** and the **Board of Directors**.

## Investigations

Atlas HXM may investigate suspected violations of this Code of Conduct, company policies and procedures, and/or applicable laws and regulations, whether reported or not. Any investigations will be conducted impartially with regard to due and fair process.

If the suspected non-compliance involves a local director, director or executive officer, a material corporate interest, financial or accounting practices, or fraud, then **Risk & Compliance** must immediately report the suspected violation to the **Board of Directors** – unless this would undermine the integrity of the investigation.

## Reporting to Authorities

Unless otherwise required by local law, and as relevant, Atlas HXM will work with the affected person/s to determine whether they wish to report the matter to police or other authorities. Atlas HXM will never pressure anyone in any direction and will respect and support their decision.

## Enforcement

In the event of non-compliance with this Code of Conduct, corrective and disciplinary action may be taken, up to and including termination of employment or other relationship with Atlas HXM. Employees should be aware that breach of some laws and regulations may have repercussions not just for Atlas HXM but for employees themselves, including civil and criminal penalties.

## No Retaliation

Atlas HXM does not tolerate retaliation against anyone for raising an issue or concern, making a report, or their involvement in an investigation. Retaliation itself can be the subject of corrective and disciplinary action.



## **Waivers**

Waivers of this Code of Conduct may be granted by the Board of Directors for non-executive directors and the Executive Team, and by the Executive Team for other employees and local directors. A waiver must not cause the individual or company to be in breach of applicable laws.

## **No Creation of Rights**

This Code of Conduct is neither intended to nor does it create any rights in any person.



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