



ETHICITI CODE OF CONDUCT



"Integrity in Action: Doing the Right Thing, Every Day."



▶ A Message from Our Leadership

At Ethiciti, we believe that ethics and compliance are not just policies—they are the foundation of a strong and sustainable business. We hold ourselves to the highest ethical standards and are committed to fostering a workplace where honesty, respect, and accountability guide everything we do.

This **Code of Conduct** is our compass for making ethical decisions and acting with integrity. We encourage an open and transparent culture where ethical concerns can be raised without fear of retaliation.

Each of us has a role to play in upholding these values and ensuring Ethiciti remains a trusted leader in ethics and compliance training.

Elizabeth (Bette) Tomaszewicz, CEO
Ethiciti



▶ Table of Contents

How to Use This Code	4
Our Responsibilities	4
Employee Responsibilities	4
Leadership Responsibilities	4
Speaking Up & Reporting Concerns	5
Zero Tolerance for Retaliation	5
Our Commitment to One Another	5
Harassment-Free Workplace	5
Workplace Safety & Well-Being	5
Our Commitment to Business Integrity	6
Avoiding Conflicts of Interest	6
Anti-Bribery & Corruption	6
Accurate Records & Financial Integrity	6
Protecting Confidential Information	6
Responsible Use of Company Resources	7
Our Commitment as a Corporate Citizen	7
Social Responsibility & Ethical Labor Practices	7
Environmental Responsibility	7
Compliance & Enforcement	8
Violations of This Code	8
Acknowledgment	8

▶ How to Use This Code

This Code applies to all employees, contractors, and business partners working on behalf of Ethiciti. It provides guidance on ethical decision-making, legal compliance, and responsible business practices.

While this Code cannot anticipate every possible scenario, it establishes clear expectations for conduct. If you are uncertain about a situation, ask yourself:

- Is it legal and compliant with company policy?
- Is it aligned with Ethiciti's values and ethical principles?
- Would I feel comfortable if my decision were made public?

If you are ever in doubt, seek guidance from your manager, Human Resources, or CEO Bette Tomaszewicz at bette@ethiciti.com or (312) 543-5911.

▶ Our Responsibilities

EMPLOYEE RESPONSIBILITIES

Every Ethiciti team member is expected to:

- Act with integrity, honesty, and professionalism.
- Follow all applicable laws, regulations, and company policies.
- Report any concerns or potential violations to the CEO or HR.
- Complete all required compliance training and apply it in daily work.

LEADERSHIP RESPONSIBILITIES

Managers and leaders must:

- Set an example by upholding high ethical standards.
- Promote a culture where ethical concerns can be openly discussed.
- Ensure employees understand and comply with this Code.
- Address concerns and escalate potential violations appropriately.

▶ Speaking Up & Reporting Concerns

Ethiciti encourages all employees to speak up if they witness or experience any ethical violations.

Concerns can be reported to:

- CEO Bette Tomaszewicz at bette@ethiciti.com or 312-543-5911
- Your manager or HR representative

ZERO TOLERANCE FOR RETALIATION

We strictly prohibit retaliation against anyone who raises a good-faith concern. Retaliation can include threats, demotions, harassment, or termination, and is itself a violation of this Code.

▶ Our Commitment to One Another

HARASSMENT-FREE WORKPLACE

Ethiciti maintains a zero-tolerance policy for workplace harassment, including:

- Sexual harassment (unwelcome advances, inappropriate jokes, or requests for favors).
- Bullying or intimidation (verbal abuse, threats, or exclusionary behavior).
- Disrespectful conduct that undermines a healthy work environment.

Employees should report any harassment concerns immediately.

WORKPLACE SAFETY & WELL-BEING

We are committed to maintaining a safe and healthy workplace.

- Violence, threats, or aggressive behavior will not be tolerated.
- Employees must not work under the influence of drugs or alcohol.
- Report unsafe working conditions or security risks immediately.

► Our Commitment to Business Integrity

AVOIDING CONFLICTS OF INTEREST

Employees must avoid situations where personal interests conflict with Ethiciti's business interests. This includes:

- Outside employment or investments that interfere with job duties.
- Personal relationships that could influence decision-making.
- Gifts and entertainment that could create an appearance of impropriety.

All potential conflicts must be disclosed to management.

ANTI-BRIBERY & CORRUPTION

Ethiciti has a zero-tolerance policy for bribery and corruption. Employees must never:

- Offer or accept bribes, kickbacks, or gifts intended to influence business decisions.
- Make facilitation payments (small payments to speed up government services).
- Engage in unethical business practices to secure contracts or partnerships.

We comply with global anti-bribery laws, including the U.S. Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act.

ACCURATE RECORDS & FINANCIAL INTEGRITY

All financial records must be accurate, transparent, and comply with accounting regulations. Employees must never:

- Misrepresent financial data or falsify records.
- Conceal business transactions or misuse company funds.
- Destroy documents related to legal inquiries or audits.

PROTECTING CONFIDENTIAL INFORMATION

Employees must protect confidential company data, client information, and trade secrets.

- Only share information with authorized individuals.
- Use secure systems when handling sensitive data.
- Report any potential data breaches or cybersecurity threats immediately.

RESPONSIBLE USE OF COMPANY RESOURCES

Employees are expected to use company assets responsibly, including computers, networks, and software.

- Personal use should be minimal and must not interfere with work.
- Cybersecurity best practices should be followed at all times.
- Intellectual property and proprietary content must be safeguarded.

► Our Commitment as a Corporate Citizen

SOCIAL RESPONSIBILITY & ETHICAL LABOR PRACTICES

Ethiciti is committed to ethical labor practices and corporate social responsibility.

- We do not tolerate child labor, forced labor, or human trafficking.
- We expect suppliers and business partners to uphold similar ethical standards.
- Employees are encouraged to participate in community engagement and sustainability initiatives.

ENVIRONMENTAL RESPONSIBILITY

Ethiciti promotes sustainable business practices to reduce environmental impact.

Employees should:

- Minimize waste and conserve resources.
- Follow company sustainability policies.
- Support green initiatives in the workplace.

► Compliance & Enforcement

All employees, contractors, and business partners must comply with this Code of Conduct.

VIOLATIONS OF THIS CODE

Failure to follow this Code may result in:

- Disciplinary action, including termination.
- Legal consequences for serious violations.
- Termination of contracts for non-compliant business partners.

If you witness or suspect a violation, report it directly to CEO Bette Tomaszewicz at bette@ethiciti.com or (312) 543-5911.

► Acknowledgment

Each year, all employees and relevant stakeholders must acknowledge their understanding and commitment to this Code of Conduct.

By signing, you agree that:

- You have read and understood this Code.
- You will comply with its principles in your daily work.
- You will report any ethical concerns or violations.

At Ethiciti, integrity is more than a value—it's how we do business.