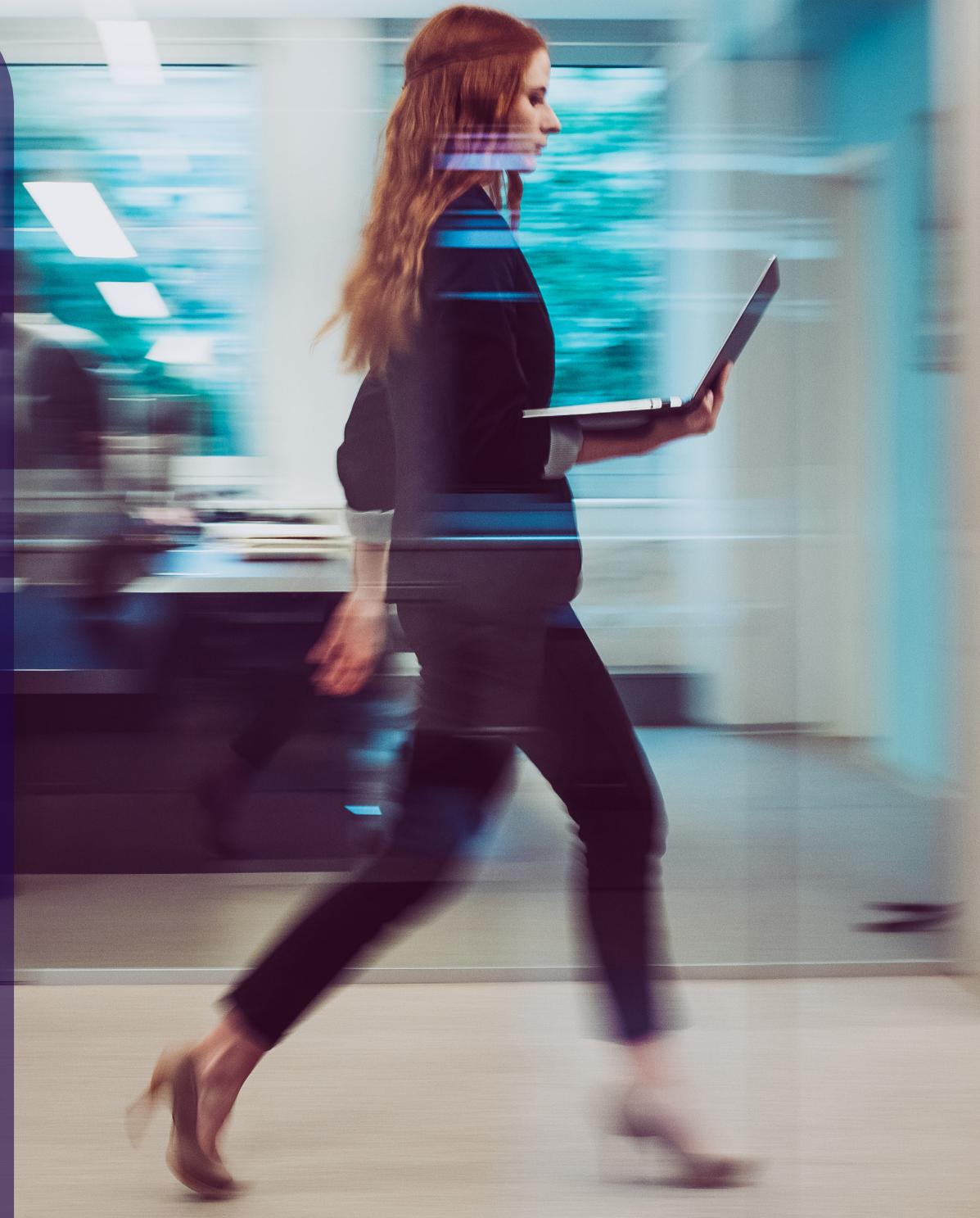


# maximus

**Code of Conduct**  
Delivering with integrity





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# Message from our CEO

Dear colleagues,

As our business grows and the world around us changes, it's important that we regularly revisit and refresh our Code of Conduct. This update ensures we stay compliant with evolving laws, ethical standards, and business practices while incorporating feedback from employees and stakeholders like you.

I'm pleased to share the newly updated Code of Conduct. It's more than a set of policies – it reflects who we are and the values we stand for. It outlines the principles and behaviors that guide our decisions and actions every day, helping us maintain the trust of our customers, partners, and communities.

The Code of Conduct isn't just a checklist of do's and don'ts – it's a reflection of our values. It helps guide our decisions, especially when things aren't black and white. Our reputation and the trust we've built over time come down to the choices we each make, every day.

Living with integrity means doing the right thing – even when it's hard – and speaking up if something doesn't feel right. If you have questions or concerns, please reach out. We're here to help, and Maximus has a zero-tolerance policy for retaliation. You'll always be supported when you raise a concern in good faith.

Thank you for your continued commitment to upholding our Code of Conduct principles and making choices that support our values. Making choices that reflect integrity strengthens Maximus' reputation as a trusted, ethical leader.

Let's keep doing the right thing – together.



Bruce Caswell

President and Chief Executive Officer

*"Our commitment to integrity means choosing to do the right thing, even when it's not easy, and speaking up if you see something that doesn't align with our Code of Conduct. "*





# Our values

At Maximus, we *deliver with integrity*. For over fifty years, we have worked with governments at all levels to help millions of people access essential services.

Our values guide every decision we make. They shape how we deliver innovative, high-quality solutions to complex challenges.

## ACCOUNTABILITY

Accepting responsibility to solve problems and rise to each challenge.

## COLLABORATION

Partnering to instill trust and working as one.

## COMPASSION

Empowering humanity by applying empathy and insight to every interaction.

## CUSTOMER FOCUS

Cultivating an authentic desire to help others succeed.

## INNOVATION

Embracing change and championing new ways forward.

## RESPECT

Valuing the work we do, who we do it with, and the people we serve.

# Our **Code**

Our Code of Conduct matters. It outlines our responsibilities, how to make ethical choices and report concerns.



## Why do we have a Code?

Our Code is a guide for how we work and make the right decisions. It helps us act with integrity, follow the law, and stay true to our values.

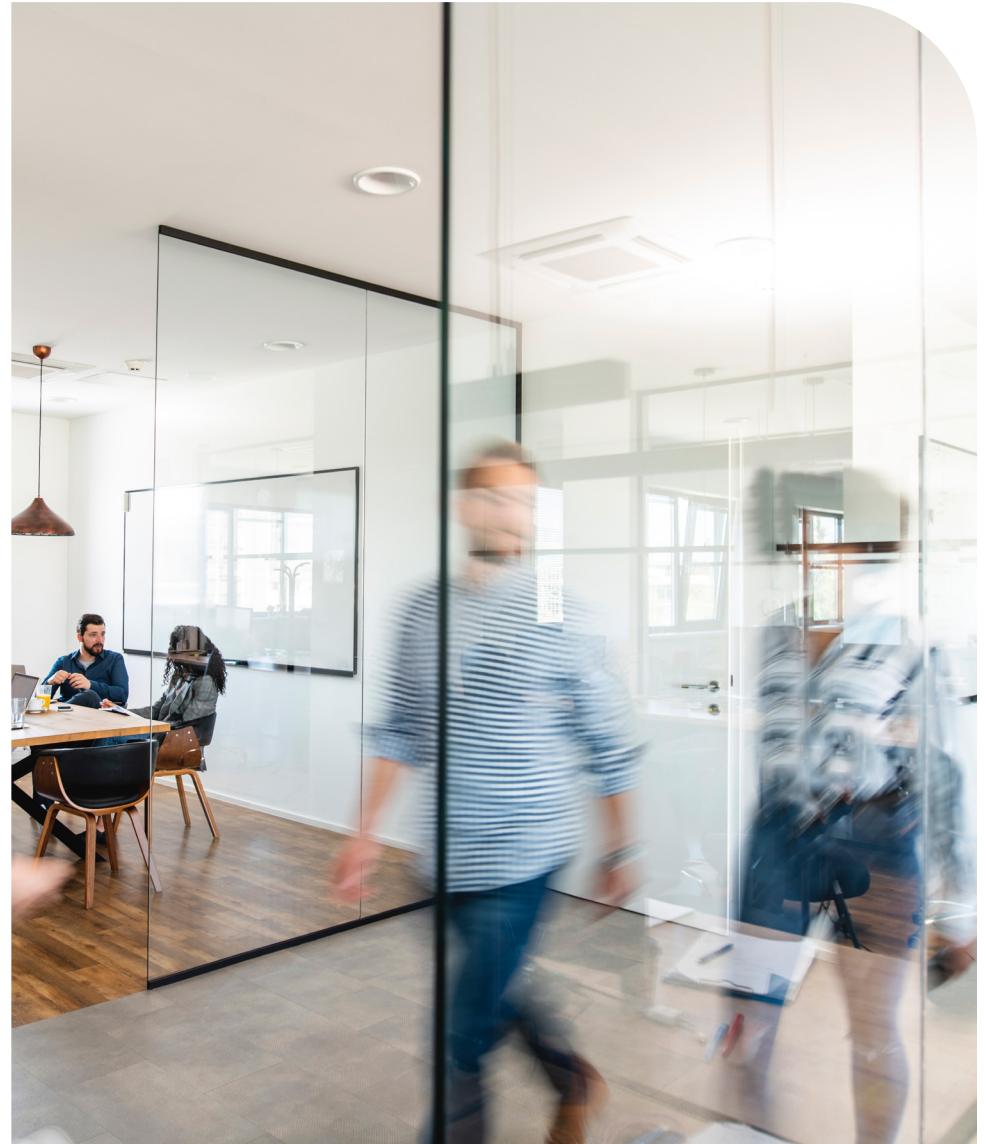
- **Supporting ethical choices:** The Code provides clear guidance for solving problems and making good decisions. It helps us work with honesty, respect, and fairness.
- **Ensuring compliance:** As a government contractor, we must follow strict laws and rules. The Code helps us meet these requirements and maintain trust with customers and communities.
- **A shared commitment:** The Code is more than rules. It reflects our shared responsibility to act with integrity. Use the Code, ask for help, and speak up about concerns.

## To whom does our Code apply?

Our Code applies equally to everyone who works for or with Maximus, including:

- employees
- officers
- independent board directors
- contingent workers

Officers or directors asking for any waivers of the Code must get approval from the Maximus Board of Directors.



## What are our responsibilities under the Code?

### Employee responsibilities:

- **Understand** and follow the Code.
- **Act** honestly, fairly, and ethically.
- **Speak up** if you see something wrong or have questions.
- **Use** good judgment and ask for help when unsure.
- **Follow** laws, policies, and rules.

### Leadership responsibilities:

- Set an example by acting with integrity.
- Help employees understand the Code and their role.
- Create a workplace where employees feel safe speaking up.
- Handle issues quickly and fairly.

### Working together

By following the Code, we build trust and ensure Maximus stays ethical and compliant. Whether you are an employee or a leader, doing the right thing is always your responsibility.



## How do I make ethical decisions?

Making ethical decisions is essential to how we work at Maximus. When faced with a tough choice, use this framework to guide you:

### 1. Know the rules

- Understand our Code and the laws and policies that apply to your work.

### 2. Ask yourself key questions

- Does this action follow the law and our policies?
- Is it fair and honest?
- How would it look to others if this decision became public?

### 3. Speak up if unsure

- If something doesn't feel right, stop and ask for help. Resources and reporting options are always available to guide you.

### A culture of integrity

Ethical decisions protect our reputation, build trust, and align with Maximus' values. By using this framework and reaching out when needed, we commit to doing the right thing.

## What happens when someone violates the Code?

At Maximus, we take violations of the Code of Conduct seriously.

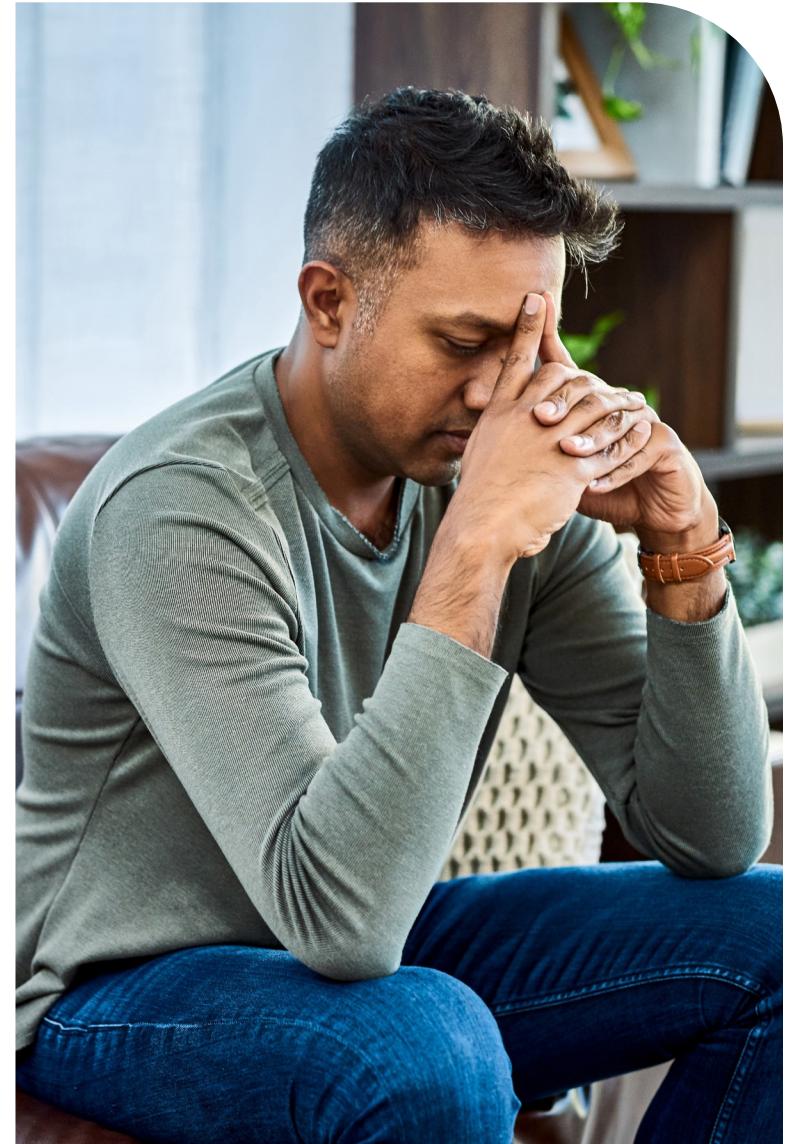
### Consequences of violations

Violating the Code, company policies, or the law can result in:

- disciplinary action, up to and including termination.
- legal consequences, such as fines or criminal charges in some cases.

### Examples of violations

- Failing to disclose a conflict of interest.
- Falsifying records like time sheets or financial reports.
- Harassment, discrimination, or unethical behavior.



## How do I ask a question or raise a concern?

We encourage everyone to speak up about questions or concerns. You can seek advice or report issues safely and securely through any of these options:

- **Talk to your supervisor:** Your manager is often the best first point of contact.
- **Human Resources (HR):** Contact HR for workplace-related concerns or questions at 1.866.307.1477 or [peopleoperations@maximus.com](mailto:peopleoperations@maximus.com).
- **Global Ethics & Compliance (GEC):** Reach out for help with ethical or compliance issues at [globalethicscompliance@maximus.com](mailto:globalethicscompliance@maximus.com).
- **Office of the General Counsel (OGC):** Consult with the OGC for complex legal issues at [LegalOps@maximus.com](mailto:LegalOps@maximus.com).
- **Maximus Ethics Helpline:** Report concerns 24/7 online at Maximus Ethics Helpline or by phone:
  - U.S. and Canada: 1.844.592.2218
  - India: 000.800.100.1071 or 000.800.001.6112
  - Saudi Arabia & UAE: Dial 1.800.10, then 1.844.592.2218 at the English prompt
  - U.K.: 0808.234.6400

### Open vs. anonymous reporting

Reports to the Ethics Helpline may be made anonymously. However, identifying yourself makes it easier for us to address your concerns. Open reporting allows for follow-up questions, faster resolutions, and a clear path for support and feedback.

### Protections against retaliation

We are committed to creating an environment where employees feel comfortable speaking up. Maximus strictly prohibits retaliation against anyone who raises a concern in good faith. Retaliation is itself a violation of the Code and will result in disciplinary action.

### When in doubt, speak up

If you're unsure about a situation, ask for help. Using the resources available ensures we uphold our values.



## What happens when I report an issue?

We take all reports seriously. We investigate them promptly and fairly. We keep information as confidential as possible. Your report helps us maintain an ethical and compliant workplace.

### How reports are handled

- **Thorough investigations:** We review each report to find the facts and resolve the issue.
- **Confidentiality:** We strictly limit information to those who must know in order to handle the concern.
- **Fair process:** Investigations are impartial, to ensure fairness for everyone involved.
- **Support:** We provide support to those involved in an investigation, ensuring they understand the process and have access to resources.
- **Additional questions:** Maximus Helpline FAQs or email [globalethicscompliance@maximus.com](mailto:globalethicscompliance@maximus.com).

### Your role

- Share as much detail as possible when making a report.
- Cooperate fully if asked to provide information during an investigation.
- Be honest and accurate when making a report or providing information.
- Ask questions if you are unsure.

Reporting concerns helps protect our workplace and ensures we live up to Maximus' values.



## Delivering with integrity in the workplace

At Maximus, our workplace is a community and culture built on respect, acceptance, and safety. We believe in fostering an environment where everyone feels valued and can thrive. Our fair labor and employment practices and respect for equal opportunities help us keep our culture safe and respectful.



# Promote safety in the workplace

## → Our commitment

Maximus strives to maintain a safe, healthy, and productive workplace for employees and workers. We comply with workplace safety laws and have policies in place for emergency preparedness.

## → Why this matters

Promoting workplace safety helps prevent accidents, enhances productivity, and helps us comply with the law.

## → How we deliver with integrity and what you can do

- **Follow** workplace safety procedures, business continuity processes, and the Crisis Management Plan.
- **Report** unsafe conditions, and act promptly to address risks.
- **Report** any acts or threats of workplace violence immediately to your supervisor, the Crisis Response team at 1.575.837.7478 (call or text) or [crisismanagementline@maximus.com](mailto:crisismanagementline@maximus.com), and, if appropriate, law enforcement.
- **Note** all emergency exits at your worksite.
- **Follow** all directions for evacuation during fire drills or in real emergencies.
- **Comply** with the company's drug and alcohol policies.
- **Respect** tobacco-use policies by smoking or vaping only in designated areas.
- **Seek** help through our Employee Assistance Program if you are struggling with addiction or your mental health.



## Integrity in action



**Q:** What should I do if I notice an unsafe condition, such as a slippery floor or faulty electrical equipment, in my workplace?

**A:** Report the issue to facilities, your supervisor, or HR **immediately**. Addressing unsafe conditions promptly helps prevent accidents.

# Comply with wage and hour laws

## → Our commitment

We are committed to compliance with wage and hour laws. We want everyone to be paid fairly for their work, in line with federal, state, and local laws.

## → Why this matters

Wage and hour compliance helps build a positive work experience and protects employee wellbeing. Legal working conditions support the health, safety, and fair pay of everyone at Maximus.

## → How we deliver with integrity

- **Pay** employees accurately and on time.
- **Record** time worked accurately, including overtime and time off, and ensure it is submitted promptly.
- **Get** supervisor approval before working overtime.
- **Follow** laws and policies about pay, overtime, and time reporting.



## Integrity in action

**Q:** I am an hourly employee and worked overtime without my manager's prior approval. Will I still be paid for my overtime hours?

**A:** Yes, of course. Maximus will pay you for hours worked, including overtime, in compliance with the law. But working overtime without prior manager approval violates company policy and there may be consequences. In the future, please be sure to get management approval for any overtime work.



# Provide equal employment opportunities

## → Our Commitment

Maximus provides equal employment opportunities to employees and applicants. Our employment decisions are based on job qualifications and merit. We prohibit discrimination based on legally protected traits.

## → Why this matters

Fair and merit-based employment practices ensure everyone has an equal chance to succeed.

## → How we deliver with integrity

- Make employment decisions based on qualifications and performance.
- Treat employees and applicants without bias toward legally protected attributes.
- Follow applicable antidiscrimination laws and policies.
- Accommodate different needs, such as disabilities or religious observances.

### Legally protected traits include, but are not limited to:

- race
- ethnicity
- religion
- gender
- national origin
- age
- disability
- sexual orientation



### Accommodations at Maximus

Maximus provides reasonable accommodations to support employees with disabilities, religious practices, military obligations, or lactation needs. Employees should contact the Accommodations and Leave team to request support. The process is confidential and tailored to individual needs.

### Integrity in action

**Q:** During an interview, can I ask a candidate about their family plans?



**A:** No. Do not ask about family plans, marital status, or childcare arrangements. Such questions could lead to a claim of discrimination. Instead, focus on job-related questions, such as availability for specific scheduling needs or willingness to travel.

# Respect each other in the workplace

## → Our commitment

Maximus is committed to maintaining a workplace where everyone is treated with respect and dignity. We do not tolerate harassment, discrimination, bullying, or any behavior that is not respectful and accepting.

## → Why this matters

A respectful workplace and culture fosters collaboration, morale, and productivity. By preventing harassment and addressing grievances promptly, we create an environment where employees feel safe and valued.

## → How we deliver with integrity

- **Speak** and act with courtesy and respect for others.
- **Avoid** behavior that could be seen as harassment, bullying, or discrimination.
- **Do not** make offensive jokes or comments or display inappropriate materials.
- **Report** any behavior that creates a hostile or offensive work environment.

### What is harassment?

Workplace harassment is unwelcome conduct based on protected characteristics. Such characteristics include race, color, age, religion, sex, national origin, genetic information, disability, or any other characteristic protected by law. Harassment includes verbal, physical, or written misconduct like offensive jokes, slurs, put-downs, or name-calling. It may take the form of bullying or violence, such as intimidation, threats, or physical assaults.



### What is sexual harassment?

Workplace sexual harassment is unwelcome sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature. Sexual harassment includes inappropriate touching, suggestive comments or gestures, or sharing sexual graphics, photos, or videos.

### What is bullying?

Workplace bullying is the use of force, threats, or coercion to abuse, intimidate, humiliate, or harm another employee. It includes verbal or physical abuse. It may be in-person or through a computer, smartphone, or other electronic device.

# Delivering with integrity in the marketplace

How we operate in the marketplace reflects who we are as a company. Acting with integrity means competing fairly, following laws, and building trust with customers and business partners. This guides every aspect of our work, from managing vendors to complying with government rules and contract requirements.

Our dedication to ethical business practices means we strive to avoid conflicts of interest, ensure transparency in marketing and procurement, and prevent bribery and corruption. Together, these principles strengthen our relationships and allow us to deliver with integrity.



# Reject bribery and corruption

## → Our commitment

Maximus does not tolerate bribery and corruption. We do not offer, give, or accept anything of value to gain an unfair advantage. Acting with honesty and integrity builds trust and allows us to help people access the services they need.

## → Why this matters

Bribery and corruption create barriers that harm progress and trust. Violations can lead to fines, jail time, loss of contracts, and damage to our reputation. By staying ethical, we strengthen the systems that support individuals, families, and communities.

## → How we deliver with integrity

- **Follow** anti-corruption laws and company policies.
- **Never offer or accept** bribes, kickbacks, or improper gifts.
- **Be alert** to “red flags,” like unusual payments or requests.
- **Report** any concerns right away.

## Integrity in action



**Q:** We are bidding on a new project with a customer and an employee of this customer said, “If you happen to have a job opening for my nephew, it would help you in the next program competition.” Can we offer this job?

**A:** No. Offering anything of value to a customer employee in order to gain an improper business advantage is against our policies. It’s wrong because it may appear as an attempt to influence them to favor us because we gave their nephew a job. It violates our policies and our values, and it may also be against the law.



## Integrity in action



**Q:** A vendor we are considering offered me a gift if I help approve their selection. Can I accept it?

**A:** No. Accepting gifts to influence business decisions is against our policy and in many cases the law. Report the offer immediately.

# Exchange gifts and hospitality responsibly

## → Our commitment

We handle gifts and hospitality with government officials, our customers, and our vendors carefully to avoid improper influence. Our Gifts and Hospitality Policy has clear rules to ensure the ethical exchange of gifts, meals, entertainment, or other hospitality with government officials, customers, or vendors, such as a supplier, subcontractor, or independent contractor. A gift can be anything of value, whether it is a tangible item, such as a good bottle of wine, or an intangible item, such as a job, loan, or information.

## → Why this matters

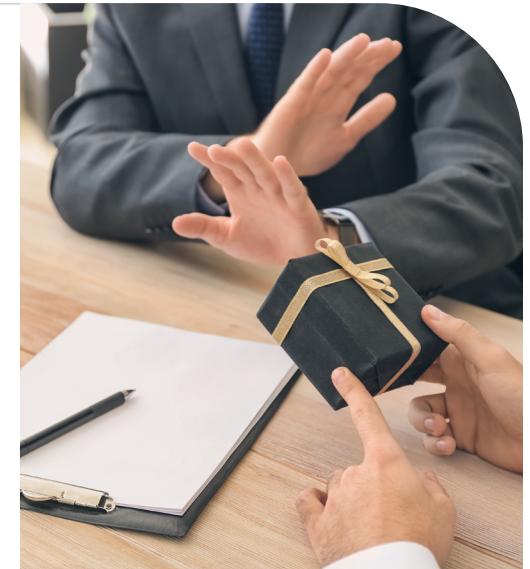
When misused, gifts and hospitality exchanged with a government official, customer, or vendor can create conflicts of interest that violate our policies and break the law. Acting responsibly protects our reputation, ensures compliance with anti-bribery laws, and builds trust with customers and business partners.

## → How we deliver with integrity

- **Ensure** that gifts or hospitality are modest and infrequent and not above the limits outlined in the Gifts and Hospitality Policy, whether offered or received.
- **Follow** legal requirements, customer rules, and the Gifts and Hospitality Policy.
- **Check** with GEC or refer to the policy if you're unsure whether a gift or hospitality is allowed.
- **Record** gifts or hospitality accurately in books and records, such as expense reports, to reflect the true nature and value of the expense.

### Special rules for government officials

Gifts and hospitality involving government officials must meet strict legal standards. Seek approval from GEC before offering a government official anything of value that exceeds the limits outlined in the Gifts and Hospitality Policy.



### Integrity in action

**Q:** A vendor gave me a pair of tickets to a sold-out concert to thank me for the business Maximus has done with them. I don't know how much they paid for them, so can I accept them?



**A:** No. Tickets to a high-demand event are likely above the acceptable threshold for gifts. Accepting them could appear to create a conflict of interest. Politely decline the tickets and explain that company policy does not allow such gifts. If you're unsure how to handle the situation, contact GEC for guidance.

# Avoid conflicts of interest

## → Our commitment

We make decisions in the company's best interest, free from personal gain or bias. A conflict of interest happens when personal relationships, financial interests, or outside activities interfere – or appear to interfere – with our job responsibilities.

## → Why this matters

Conflicts of interest can harm our business, reputation, and relationships. They create the appearance of unfairness and can undermine trust. By identifying and addressing possible conflicts, we build transparency, accountability, and ethical behavior.

## → How we deliver with integrity

- **Tell** your manager, HR, or GEC about any actual or likely conflicts using the Conflicts of Interest Form.
- **Avoid** outside jobs, investments, or board memberships that compete with Maximus or affect your decisions at work.
- **Disclose** close personal relationships with coworkers, business partners, or customers.
- **Ensure** there is no direct reporting relationship between you and a family member or close personal relationship.
- **Seek** advice and approval from GEC before engaging in hiring discussions with a government official.
- **Request** a written waiver from the Chief Compliance Officer if you believe an exception is necessary.



## What is a conflict of interest?

A conflict of interest is when personal relationships or activities influence your ability to act in Maximus' best interest. Examples include:

- supervising a relative.
- outside employment with a competitor or business partner.
- having a close personal relationship with an employee of a customer or business partner.
- directing Maximus business opportunities to a friend or relative.

## Integrity in action



**Q:** My romantic partner works for a customer, and I've been assigned to a Maximus program with that customer. Should I report this?

**A:** Yes. Having a personal relationship with someone who works for a customer could create the appearance of bias. Disclose this relationship to your manager or GEC. They will determine the best course of action.

# Compete fairly

## → Our commitment

Maximus is committed to competing ethically and following anti-competition laws. We believe in fair, open, and lawful competition.

## → Why this matters

Fair competition fosters innovation, trust, and respect in the marketplace. Violating anti-competition laws can lead to steep fines, costly lawsuits, and harm to our reputation. As a government contractor, when we compete for government business, the stakes are even higher. Violations can lead to losing a contract or being barred from future contracts. By competing fairly, we protect our customers, communities, and the integrity of our business.

## → How we deliver with integrity

- **Interactions** with competitors should avoid discussions, understandings, and especially any agreement to fix prices, divide markets, or anything that would limit competition.
- **Prepare** bids and proposals independently, without discussing them with competitors or seeking inside information from customers.
- **Ensure** claims about Maximus' services are truthful and accurate.
- **Never misuse** others' confidential information, especially that of a competitor or customer.



## Integrity in action

**Q:** A competitor suggested we agree to charge the same prices in our proposals on a new project. What should I do?

**A:** Refuse immediately and report the incident to the OGC. Such agreements violate anti-competition laws because they reduce competition.



# Follow ethical procurement and marketing practices

## → Our commitment

Maximus maintains high ethical standards in our procurement and marketing. We bid on projects ethically and in compliance with the law. We select vendors based on merit, and our marketing practices are lawful and honest.

## → Why this matters

Fair and ethical practices build trust with customers, vendors, and communities. They maintain a legal and level playing field and protect our reputation.

## → How we deliver with integrity

- **Select** vendors (such as suppliers or subcontractors) based on competitive pricing, qualifications, past performance, and fitness for the business purpose. Do not let personal relationships, gifts, or favors sway your decisions concerning Maximus.
- **Ensure** marketing materials and proposals accurately describe our capabilities. Do not exaggerate or make false claims.
- **Comply** with procurement laws. Never have job discussions with procurement officials during an ongoing procurement, discuss sensitive information with government officials outside of the standard procurement process, or seek or use nonpublic information belonging to the government or our competitors in our proposals.
- **Never** offer or accept bribes, kickbacks, or anything of value to influence decisions.
- **Submit** proposals that are accurate, truthful, and realistic about our performance, costs, timelines, and credentials.



## Know the rules for marketing to government customers

- Certain marketing actions, such as engaging in discussions with customers about their programs, are allowed before a Request for Proposal (RFP) is released.
- However, contact with customers regarding a procurement is restricted after an RFP is released. Consult the OGC to understand the limitations.

# Comply with government rules and contract requirements

## → Our commitment

Maximus strives to meet government contract requirements and the laws and regulations that apply to them. Honesty, accuracy, and integrity guide our work with government customers. We maintain their trust and fulfill our obligations.

## → Why this matters

Our business depends on strong relationships with government customers. Complying with government contract requirements and the laws and regulations that apply to them protects our reputation, ensures the responsible use of taxpayer funds, and prevents legal consequences. By meeting these standards, we support our customers and the systems that serve communities.

## → How we deliver with integrity

- **Comply** with customer contract requirements, ensuring that our obligations are carried out fully and ethically throughout the term of the contract.
- **Submit** truthful and complete data in our time sheets and in invoices and communications with government agencies.
- **Ensure** costs are correctly authorized and billed only for work performed.
- **Always obtain** proper authorization before accepting or using government information.



## Handling time sheets and invoices

- Record time worked accurately and charge it to the correct account.
- Ensure invoices match time sheets and reflect only work completed.
- Remember that false charges or records can result in termination and legal action.

# Follow trade controls

## → Our commitment

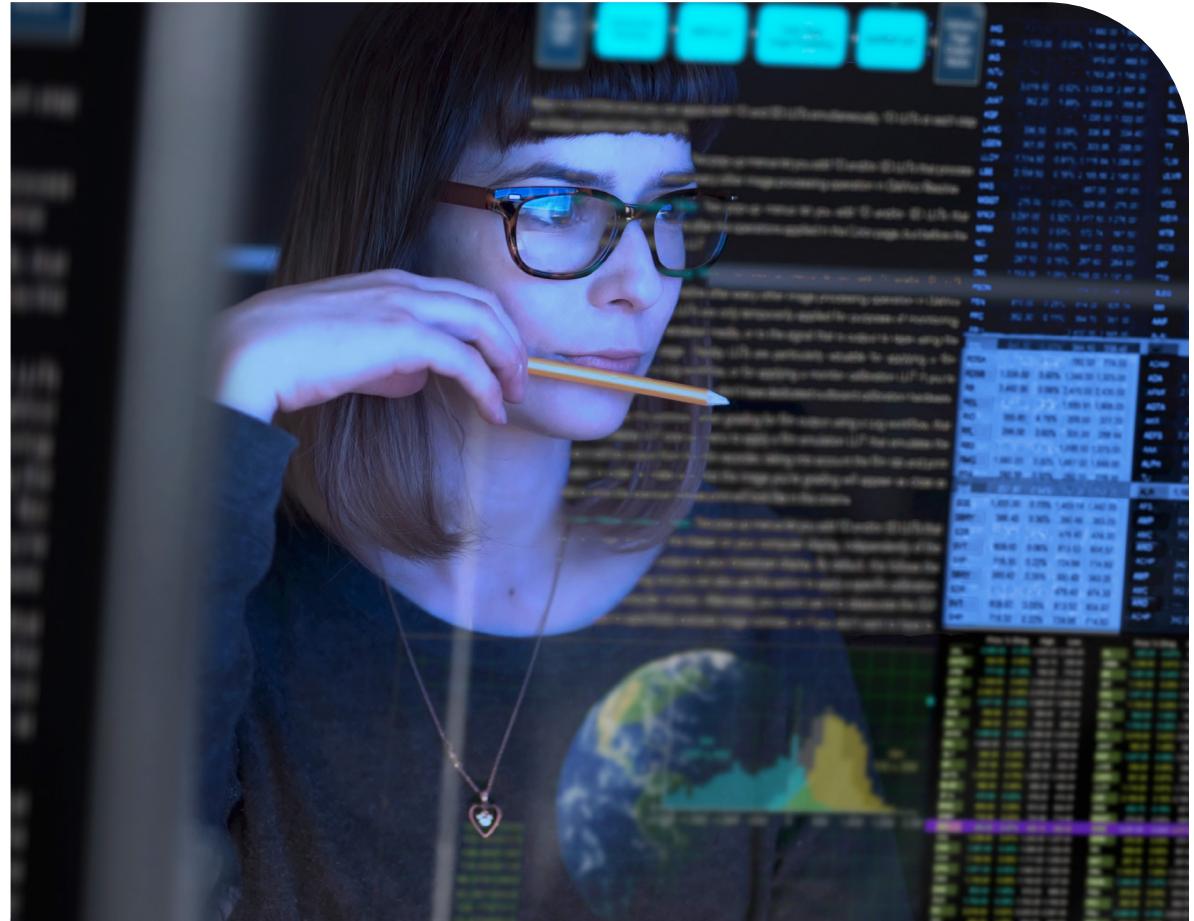
Maximus complies with trade laws, sanctions, and anti-boycott regulations. We ensure goods, services, and information move across borders lawfully.

## → Why this matters

Trade laws protect national security, prevent illegal activities, and promote fair global trade. Violating these laws can result in severe penalties, including fines, loss of contracts, and reputational harm.

## → How we deliver with integrity

- **Follow** import, export, and sanctions laws in the countries where we operate.
- **Do not** do business with entities or individuals subject to sanctions or embargoes.
- **Ensure** proper authorization for exporting software, technology, or equipment.
- **Reject** boycotts not supported by U.S. law. Report any boycott requests to GEC immediately.
- **Record** all transactions accurately, and ensure compliance with reporting requirements.

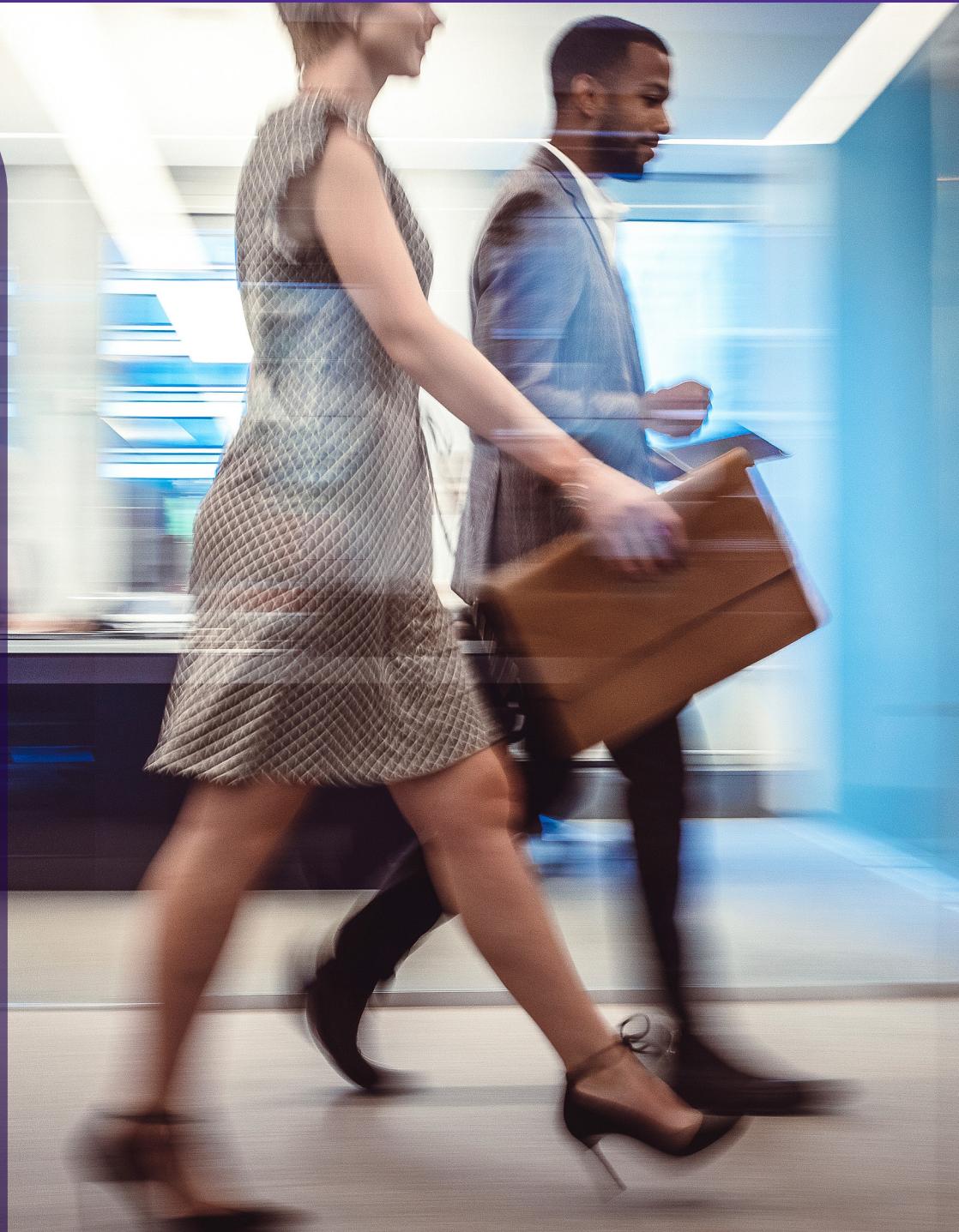


### Trade sanctions and export controls

Always check if a customer, supplier, or other third party is on a restricted list before doing business with them. Exporting controlled items without authorization can lead to legal consequences. If you need help or have any questions, contact GEC.

## Delivering with integrity at our company

At Maximus, integrity guides how we operate every day. We focus on protecting company assets. It's our duty to act transparently, prevent misuse, and follow policies and laws. By protecting our assets, we uphold our duties to customers, employees, and stakeholders.



# Maintain accurate financial records and accounts

## → Our commitment

We keep honest and accurate financial records. This ensures that our operations are transparent and compliant with laws and regulations.

## → Why this matters

Trust, accountability, and sound decisions depend on accurate financial records. Incorrect, misleading, or false financial reporting can harm our reputation and lead to legal consequences.

## → How we deliver with integrity

- **Ensure** financial data, including time sheets, invoices, and expense reports, are truthful and complete.
- **Use** proper accounting principles to record, value, and disclose transactions.
- **Never falsify** records or create misleading entries.
- **Charge** customers for work performed, and make payments only for services rendered.
- **Comply** with internal policies for financial reporting, and ensure records are properly reviewed.



### Handling financial records

Financial transactions must be recorded promptly, accurately, and clearly. Misleading or false information, including omissions, can lead to disciplinary action or legal penalties.

### Integrity in action



**Q:** I noticed an error in my time sheet after submitting it.

It was an honest mistake, but I'm not sure if I should report it since it may delay my paycheck. What should I do?

**A:** Always correct financial records, even if the mistake was unintentional.

Report the error to your manager or the appropriate department immediately. Honest reporting protects Maximus' integrity and ensures compliance with company policies and the law.

# Protect our information assets

## → Our commitment

We protect restricted data, such as health records and other personal data, and proprietary data, such as financial data and intellectual property, like trade secrets. We follow strict guidelines to do so, especially with information that can identify someone.

## → Why this matters

Data breaches, whether by accident or a security lapse, can have serious effects. For the company, this means legal trouble, financial loss, and damage to our reputation. For individuals, it can lead to identity theft or loss of privacy.

## → How we deliver with integrity

- **Use** only the data needed to complete a task.
- **Know** what type of information you are handling and how to protect it.
- **Follow** privacy and security measures outlined in our policies.
- **Report** any privacy or security issues right away.
- **Dispose** of data properly when it's no longer needed.



## What is proprietary data?

Proprietary data is highly sensitive business data that includes financial statements, contract information, and intellectual property, or "IP." IP includes inventions and creative works protected by law, such as graphics, logos, trade secrets, and software. We respect IP, whether it's Maximus' or someone else's.

Proprietary information, including IP, is often confidential, such as with a trade secret. However, it may also be publicly available information, like a brand name, a patented invention, or published works. Much of what is on the internet, for example, is copyrighted and requires permission to use, even if there is no copyright notice.

# Protect our information assets

## What is restricted data?

Restricted data is extremely sensitive data that may not be accessed or shared without authorization. It includes classified or other governmentally controlled data, payment card information, tax information, and personal information. Personal information generally falls into two categories:

- **Protected Health Information (PHI):** Any health information tied to a person, such as medical records or payment history. If it relates to someone's health, consider it PHI.
- **Other Personally Identifiable Information (PII):** Any data that can be used to identify a specific individual. This includes direct identifiers like name, social security number, or email address, as well as indirect identifiers that, when combined with other information, can reveal an individual's identity, such as date of birth or geographic location.

We must recognize both PHI and PII and understand the rules that apply. This includes knowing how to classify, handle, share, and dispose of it properly.



## Integrity in action



**Q:** I received a report that includes full Social Security numbers and health details, but I only need basic demographics. What should I do?

**A:** Don't use the extra information. Let your manager or the Privacy Office know right away. They can send a report with only the details you need. Using unneeded sensitive data adds risk, so work only with what's required.

# Safeguard company resources

## → Our commitment

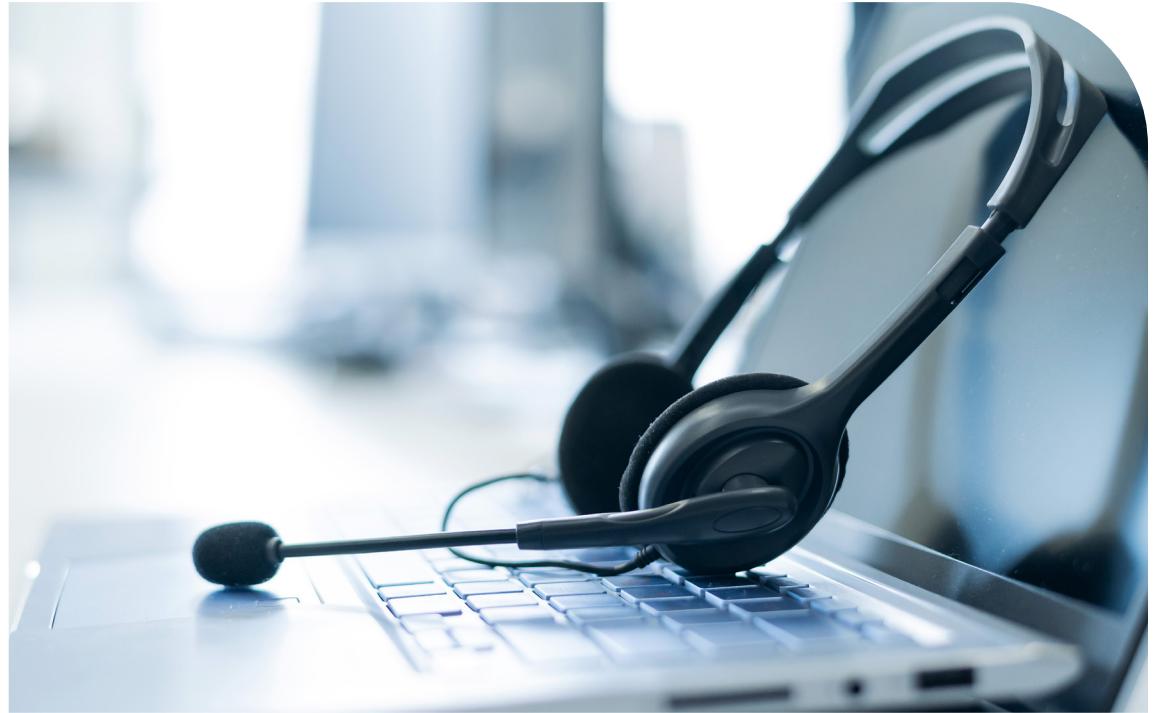
Maximus provides tools and resources to help us do our jobs effectively. We must use these resources responsibly and protect them from loss, misuse, or damage.

## → Why this matters

Using company property properly ensures resources are available to support our mission. It also helps avoid extra costs and keeps operations running smoothly. Misuse can harm productivity and lead to expensive mistakes.

## → How we deliver with integrity

- **Keep** company-issued devices safe. Report any loss or damage to the IT Service Desk and your manager immediately.
- **Use** hardware, software, and systems only for approved business purposes. Do not install unauthorized software or use personal email for work.
- **Never share or misuse** access credentials. Report any unauthorized access right away.
- **Use** company resources, like office supplies, vehicles, and facilities, only for work-related purposes.
- **Return** company equipment and materials when your employment ends.



## Integrity in action



**Q:** While using my company laptop, I noticed a pop-up that said my system was infected and asked me to download a file to fix it. What should I do?

**A:** Do not click on the pop-up or download anything. This could be malware. Disconnect from the internet, report the issue to the IT Service Desk immediately, and follow their instructions. Acting quickly can prevent harm to the company's network and data.

# Manage our business records

## → Our commitment

At Maximus, we manage business records responsibly to ensure compliance with laws and internal policies. This includes creating, retaining, and destroying records properly and only when appropriate.

## → Why this matters

Accurate and well-managed records are essential for meeting legal requirements, maintaining trust with customers and regulators, and supporting business operations. Improper handling of records can lead to legal risks, reputational harm, and operational disruptions.

## → How we deliver with integrity

- **Ensure** records accurately reflect transactions and activities.
- **Retain** records for at least the required time outlined in Maximus' Data Governance and Security Policy.
- **Destroy** records only when authorized, and ensure disposal complies with company policies and legal requirements.
- **Keep** records secure and prevent unauthorized access, especially during active audits, investigations, or litigation.



## Important reminder

Never destroy or alter records if they are under a legal hold, audit, or investigation. Even if the records are scheduled for destruction, you must keep them intact until the hold is lifted. When in doubt, contact the OGC.

# Avoid insider trading

## → Our commitment

At Maximus, we strictly prohibit insider trading. This means you must not trade in a company's stock while having material, nonpublic information about that company. It also prohibits sharing this information with others who might then trade the same stock.

## → Why this matters

Insider trading is against the law and damages trust in financial markets. It can lead to serious penalties, including fines and jail time, as well as harm to Maximus' reputation.

## → How we deliver with integrity

- **Do not** buy or sell stock if you have material, nonpublic information about Maximus or another company.
- **Protect** nonpublic information, and do not share it with anyone, including family or friends.
- **Understand** what counts as "material," which is any information that could affect a company's stock price.
- **Follow** rules for blackout periods and preclear any trades with the Chief Legal Officer, as described in the Insider Trading Policy.
- **Check** the Insider Trading Policy or ask the OGC if you are unsure about a trade.



## What are examples of material, nonpublic information?

Material, nonpublic information is any fact that could influence an investor's decision to buy, sell, or hold stock that has not yet been made public. Examples include:

- financial results not yet announced.
- pending mergers or acquisitions.
- changes in executive management.
- negotiation of significant contracts.

## Integrity in action

**Q:** I learned that Maximus is about to announce a big new contract. If there is no blackout period, can I buy stock before the news is made public?

**A:** No. Buying Maximus stock while having material, nonpublic information about Maximus stock violates the law and company policy. Wait until the contract is announced publicly. Then make sure enough time has passed for the public to understand the news before trading. If unsure, check with the OGC.



# Delivering with integrity in our communities

At Maximus, integrity is more than how we work; it's about making a positive impact in the world.

We support communities by being transparent and using technology responsibly. We support charities and volunteer efforts. We expect employees to act ethically in public and political settings.



# Practice good corporate citizenship

## → Our commitment

Maximus embraces its role as a global leader by fostering equitable, inclusive, and sustainable communities. We engage with organizations that address systemic challenges and promote equity. By respecting cultural differences, we meet the unique needs of our communities.

## → Why this matters

We are dedicated to government health and human services, and our impact goes beyond business. Partnering with communities to address local needs enhances quality of life and builds strong communities.

## → How we deliver with integrity

- **Collaborate** with governments and organizations to develop programs that improve access to health, education, and economic opportunities.
- **Adapt** our services and engagement strategies to honor the customs and traditions of the communities we serve.
- **Reduce** our environmental impact through responsible business practices, such as energy-efficient operations and waste-reduction initiatives.



# Give back to our local communities

## → Our commitment

Maximus is dedicated to supporting our communities through volunteerism and philanthropic contributions, creating lasting impact by helping those in need.

## → Why this matters

Giving back strengthens our connections and reinforces our mission to deliver with integrity. Volunteerism and philanthropic giving foster goodwill and contribute to stronger, healthier communities.

## → How we deliver with integrity

- **Volunteer** in our communities through company-supported initiatives, such as on dedicated volunteer days and team service projects.
- **Give** to nonprofit organizations through the Maximus Foundation, corporate financial donations, and partnerships that focus on health and personal development.
- **Support** community-led nonprofits through the Maximus Foundation to advance education, child welfare, and healthcare access.



### Maximus Foundation: Making an impact

In 2024, the Maximus Foundation donated over \$2 million to 209 nonprofits across 32 states and Washington, D.C. Since our founding, we have distributed over \$16.8 million through 3,280 grants to U.S.-based nonprofits. The generous support of thousands of Maximus staff made all this possible.

### Global presence

Maximus also has a foundation in the U.K., extending our commitment to community support and engagement internationally.

# Participate in the political process responsibly

## → Our commitment

Maximus respects your right to participate in the political process. At the same time, we must keep personal political activities separate from the company to ensure compliance with laws and ethical standards. For those eligible, employees may participate with our Political Action Committee (PAC). Consult the Government Relations website for more information.

## → Why this matters

Involvement in politics and advocacy will reflect on Maximus if not handled responsibly. Following these guidelines protects the company's reputation and ensures compliance with legal and ethical requirements.

## → How we deliver with integrity

- **Engage** in political activities on your own time and at your own expense. Do not use Maximus resources, including funds, email, or facilities, for political purposes without prior written approval.
- **Never use** your role at Maximus to influence political outcomes or decisions unfairly because of conflicting interests.
- **Follow** rules for political or charitable contributions made on behalf of Maximus, and if appropriate, get Government Relations or GEC approval.



## Special rules for lobbying and government officials

Before engaging in lobbying activities or working with government officials on public policy, consult the Government Relations team in the OGC. Interactions with government officials must comply with anti-bribery laws, government ethics rules, political laws and regulations, as well as Maximus policies.

# Communicate appropriately

## → Our commitment

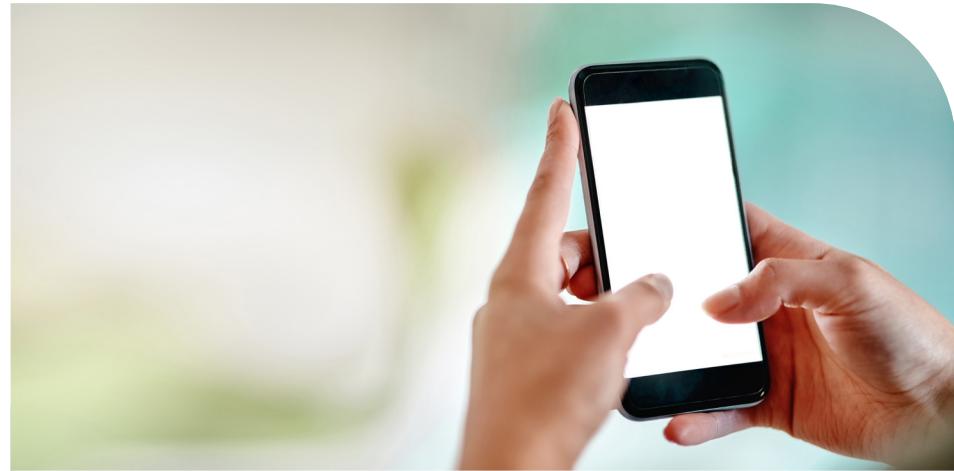
At Maximus, we value honest, respectful, and accurate communication. Whether speaking with customers or the media or using social media, we choose our words carefully to protect the company's reputation.

## → Why this matters

Clear and responsible communication builds trust and prevents misunderstandings. Misusing communication channels can damage relationships, expose private information, or harm Maximus' reputation.

## → How we deliver with integrity

- **Speak** on behalf of Maximus only if authorized. Refer all media inquiries to Public Relations.
- **Use** social media responsibly. Make it clear that your personal posts reflect your views, not those of Maximus. Never share confidential or proprietary information online.
- **Ensure** public statements and materials are truthful, respectful, and aligned with company values. Avoid false claims or sharing sensitive information.
- **Respect** legal protections for discussing wages or conditions of employment. Employees can also share information when required for whistleblower protection or reporting violations.



### Guidelines for social media use

- Don't share confidential or sensitive information.
- Avoid using personal accounts to comment on behalf of Maximus.
- Use disclaimers like "views are my own" when referencing your role at Maximus.
- Always respect others and follow social media policies.

### Integrity in action

**Q:** I saw a post on social media that falsely claims Maximus acted unethically. Can I respond to defend the company?



**A:** No. Do not respond directly. Refer the post to Corporate Communications so they can handle it appropriately. Engaging personally could escalate the issue and harm Maximus' reputation.

# Use artificial intelligence responsibly

## → Our commitment

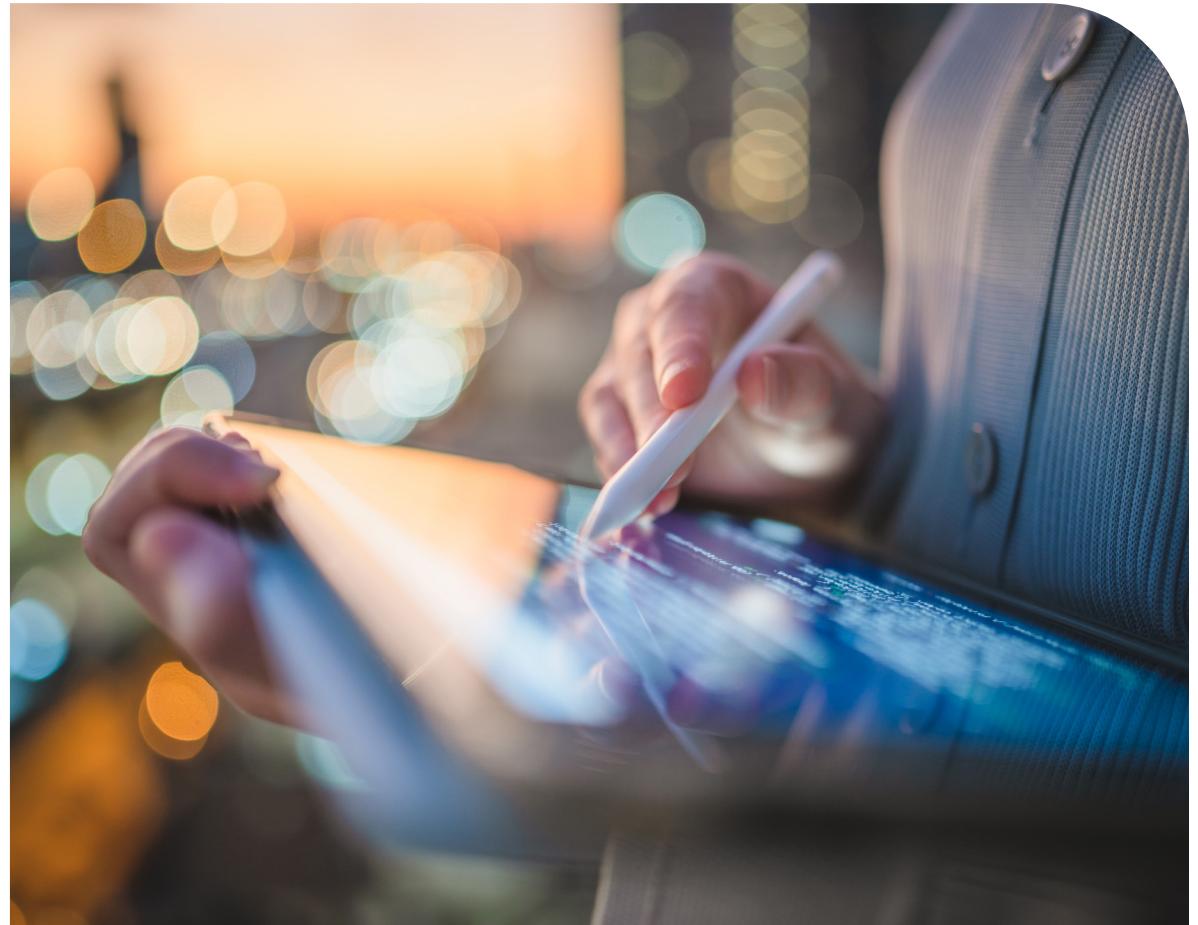
As artificial intelligence (AI) technology evolves, it is transforming society. We must use AI in a way that aligns with our values, meets legal requirements, and supports our business goals. Our culture promotes responsible AI use.

## → Why this matters

AI helps us work more efficiently, innovate, and explore. While AI creates opportunities, it also has risks that we must address responsibly. Our AI use must align with industry standards and best practices. Since generative AI tools can produce biased or incorrect results, always have AI output reviewed by subject-matter experts.

## → How we deliver with integrity

- **Submit** AI-generated output for subject-matter expert review before using or sharing.
- **Do not** input sensitive or confidential data into AI tools without proper approval.
- **Do use** AI tools in ways that prioritize accountability, fairness, and nondiscrimination.
- **Comply** with applicable laws and company rules when using AI technologies.



## What is generative AI?

Generative AI (GAI) refers to technology that creates text, images, music, and software code on demand. Examples include ChatGPT, DALL-E 2, Stable Diffusion, and many more. These tools can help us draft documents, analyze data, or create visuals.



# Key contacts

**GEC**

[globalethicscompliance@maximus.com](mailto:globalethicscompliance@maximus.com)

**Crisis Management**

1.575.837.7478 (call or text)

[crisismanagementline@maximus.com](mailto:crisismanagementline@maximus.com)

**OGC**

[legalops@maximus.com](mailto:legalops@maximus.com)

**Maximus Ethics Helpline**

- U.S. and Canada: 1.844.592.2218
- India: 000.800.100.1071 or 000.800.001.6112
- Saudi Arabia & UAE: Dial 1.800.10, then 1.844.592.2218 at the English prompt
- U.K.: 0808.234.6400

**Privacy & Data Protection Office**

[privacyofficial@maximus.com](mailto:privacyofficial@maximus.com)

**Information Security**

[ISO@maximus.com](mailto:ISO@maximus.com)

**Corporate Communications (Social Media)**

[Corporatecommunications@maximus.com](mailto:Corporatecommunications@maximus.com)

**HR**

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# maximus

**Code of Conduct**

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