

## **EDM COUNCIL CODE OF CONDUCT**

### **COMPLIANCE WITH LAWS, RULES, AND REGULATIONS**

Acting ethically and obeying the law, both in letter and spirit, are among EDM Council's core values. We expect employees and contractors to understand the legal requirements applicable to their area of responsibility, including federal, state, and foreign laws, as well as the relevant non-profit and not-for-profit schemes. All employees and contractors are also expected to act with integrity and to exercise good judgment and common sense in their efforts to comply with all applicable laws, rules, and regulations and are encouraged to ask for advice from senior management when they are uncertain about them.

We also believe that every employee and contractor is responsible for becoming familiar with all EDM Council policies so that they may integrate them into every aspect of our business.

EDM Council considers violation of the law, company/firm policies, and this Code of Conduct to be a serious matter. Any violation may subject an employee to disciplinary action, up to and including termination. Additionally, those who work with us, including contractors, consultants, volunteers, and their representatives (collectively, "third parties"), are expected to maintain professional conduct and follow all applicable laws and regulations. Violation of the law, company/firm policies, and this Code of Conduct by third-parties may subject the third-party to termination of contract and/or disassociation with the EDM Council.

Certain violations may be referred to legal authorities for investigation and civil or criminal prosecution. If you become aware of the violation of any law by EDM Council, whether by its officers, employees, or any third party doing business on behalf of EDM Council, it is your responsibility to promptly report the matter to senior management. While EDM Council strives to address matters internally, nothing in this Code of Conduct should discourage you from reporting illegal activity, including any violation of the law whether federal, state, local, or foreign law, rule or regulation, to the appropriate legal authority. This Code of Conduct should not be construed to prohibit employees or contractors from testifying, participating, or otherwise assisting in any state or federal administrative, judicial or legislative proceeding or investigation.

### **ADDRESSING CONDUCT THAT IS HARMFUL TO OUR CULTURE AND VALUES**

EDM Council respects the rights of all employees and contractors to express themselves. We believe that open dialogue and free expression of ideas is critical to our business. However, EDM Council will take all reasonable and appropriate steps to address situations where an employee's or contractor's conduct or speech endangers the safety of others, violates others' rights to be free from harassment, discrimination, and retaliation, or otherwise conflicts with EDM Council's culture and values, up to and including termination of employment.

EDM Council is committed to respecting human rights in the global communities we serve, conducting our business in accordance with internationally recognized human rights standards

and ensuring that no practices of child labor, modern slavery or human trafficking take place with the EDM Council.

## **HONEST AND ETHICAL CONDUCT AND FAIR DEALING**

EDM Council employees and contractors should endeavor to act honestly, ethically, and fairly in both internal and external dealings, including interactions with co-workers, contractors, service providers, and any other third parties with which EDM Council may conduct business. Statements regarding EDM Council's business must not be untrue, misleading, deceptive, or fraudulent. You must not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair dealing practice. Employees are also prohibited from creating or submitting false, inaccurate, or misleading invoices, receipts, or other financial or business-related documents to EDM Council or related businesses.

## **UNACCEPTABLE BEHAVIOR**

The rules set forth below are intended to provide employees and contractors with notice of what is expected of them. However, such rules cannot possibly identify every type of unacceptable conduct and performance. Therefore, employees and contractors should be aware that conduct not specifically listed below but which adversely affects or is otherwise detrimental to the interests of the EDM Council, other employees, contractors or customers, may also result in disciplinary action, up to and including immediate termination.

Employees may be disciplined for misconduct and independent contractors' contracts may be terminated or non-renewed for including but not limited to the following:

- Insubordination
- Dishonesty
- Theft, Money Laundering, Bribery, Unfair Competitive Dealing, Corruption
- Misusing or destroying EDM Council's property or the property of another;
- Violating conflict of interest rules
- Disclosing or using confidential or proprietary information without authorization
- Falsifying or altering EDM Council records, including an application for employment or time records
- Interfering with the work performance of others
- Altercations
- Harassment, including sexually harassing employees, customers, and third parties
- Being under the influence of, manufacturing, dispensing, distributing, using, or possessing alcohol or illegal or controlled substances on EDM Council property or while conducting EDM Council business
- Sleeping on the job or leaving your work location/work site without authorization
- Violation of safety or health rules
- Possessing a firearm or other dangerous weapon or materials on EDM Council property or while conducting EDM Council business

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- Being convicted of a crime that indicates unfitness for the job or raises a threat to the safety or well-being of the Company, its employees, customers, or property
- Gambling on EDM Council premises or while conducting EDM Council business
- Failure to call in or report for your scheduled shift of work or contract work whether that work is scheduled to be in-person or conducted remotely. An absence (in-person or remotely) of three (3) consecutive scheduled workdays without notifying your supervisor or his or her designee is job abandonment and is considered a voluntary resignation or employment and/or termination of independent contracts.

The EDM Council, with respect to employees, reserves the right to proceed directly to a written warning, demotion, or termination for misconduct or performance deficiency, without resort to prior disciplinary steps, when the EDM Council deems such action appropriate. The EDM Council, with respect to contractor, reserves the right to proceed directly to termination as outlined above.

**EMPLOYEE ACKNOWLEDGMENT**

PLEASE SIGN AND RETURN TO Mark Zill, CIO & Head of HR – [mzill@edmcouncil.org](mailto:mzill@edmcouncil.org)

I acknowledge that I have received and read a copy of the EDM Council’s Code of Conduct Policy. I understand that I am responsible for complying with the policy during my employment with EDM Council.

**I HAVE CAREFULLY READ THIS ACKNOWLEDGEMENT.**

Date: \_\_\_\_\_

Signature: \_\_\_\_\_

Printed Name: \_\_\_\_\_

**INDEPENDENT CONTRACTOR ACKNOWLEDGMENT**

PLEASE SIGN AND RETURN TO Mark Zill, CIO & Head of HR – [mzill@edmcouncil.org](mailto:mzill@edmcouncil.org)

I acknowledge that I have received and read a copy of the EDM Council’s Code of Conduct Policy. I understand that I am responsible for complying with the policy during my contractual relationship with EDM Council.

**I HAVE CAREFULLY READ THIS ACKNOWLEDGEMENT.**

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Date: \_\_\_\_\_

Signature: \_\_\_\_\_

Printed Name: \_\_\_\_\_