



## Ever Better Code of Conduct\*

Everything we do in connection with our work at Ever Better will be, and should be, measured against the highest possible standards of ethical business conduct.

### Integrity

Our reputation as a company that our clients can trust is our most valuable asset, and it is up to us to make sure that we continually earn that trust. All our communications and interactions with our clients should increase their trust in us. We should always avoid conflicts of interest, and circumstances that may reasonably present the *appearance* of a conflict.

### Privacy and Confidentiality

Everyone at Ever Better must protect the privacy and security of confidential client information. We use best judgement in determining which information may be sensitive, and err on the side of protecting client confidentiality.

### In the Workplace

Ever Better is committed to prohibiting and effectively responding to harassment, discrimination, misconduct, abusive conduct, and retaliation. To that end, Ever Better adheres to these principles:

**Commitment:** Ever Better is committed to a respectful, safe, and inclusive working environment for all employees, and external colleagues to the extent we can influence this.

**Care:** Ever Better creates an environment that emphasizes respect for each individual, including specifically by offering assistance and showing empathy to employees and members of the extended workforce throughout and after any complaint process.

**Transparency:** Ever Better is open and transparent as an organization regarding the frequency with which complaints arise regarding harassment, discrimination, misconduct, abusive conduct, and retaliation, and the Company's approach to investigating and responding to those allegations.

**Fairness & Consistency:** Ever Better ensures that individuals are treated respectfully, fairly, and compassionately, and applies policies, procedures, and outcomes consistently regardless of who is involved.

**Accountability:** Ever Better holds all individuals responsible for their actions, and ensures that where appropriate, those individuals hold others accountable too.

**Retaliation:** Ever Better prohibits retaliation against any worker who reports or participates in an investigation of a possible violation of our Code of Conduct, other policies, or the law.

\*Ever Better's Code of Conduct was derived from the Google Code of Conduct



### Equal Opportunity Employment

Employment here is based solely upon individual merit and qualifications directly related to professional competence. We strictly prohibit unlawful discrimination or harassment on the basis of race, color, national origin, ancestry, religion, veteran status, pregnancy status, sex, gender identity or expression, sexual orientation, age, marital status, mental or physical disability, medical condition, or any other characteristics protected by law. We also make all reasonable accommodations to meet our obligations under laws protecting the rights of people with disabilities.

### Harassment, Discrimination, and Bullying

Ever Better prohibits discrimination, harassment and bullying in any form – verbal, physical, or visual. If you believe you've been bullied, harassed, or discriminated against by anyone at Ever Better, or by an Ever Better partner or vendor, we strongly encourage you to immediately report the incident. The company will promptly and thoroughly investigate any complaints and take appropriate action.

### Safe and Healthy Workplace

We are committed to a safe, healthy, and violence-free work environment. Behavior that poses risk to the safety, health, or security of employees or visitors is prohibited and should be reported immediately. Substance abuse is incompatible with the health and safety of our employees, and we don't permit it. Consumption of alcohol is not banned at our offices, but use good judgment and never drink in a way that leads to impaired performance or inappropriate behavior, endangers the safety of others, or violates the law. Illegal drugs in our offices or at sponsored events are strictly prohibited.

### Retaining Records

Ever Better is committed to accurate and complete record-keeping. We keep records for an appropriate length of time, based on legal requirements, tax and accounting rules.

### Obeying the Law

Ever Better takes its responsibilities to comply with laws and regulations very seriously. We are expected to comply with applicable legal requirements and prohibitions at the federal, state, and local levels.

Ever Better is subject to anti-bribery and anti-corruption laws, as are all businesses. We are committed to comply with these laws under all circumstances. We want to avoid the possibility that any gift, entertainment, or other business courtesy could be perceived as a bribe, so it's always best to provide such business courtesies infrequently and, when we do, to keep their value moderate.

### Commitment to Fiscal Integrity

Ever Better will agree in advance with each client on the basis for fees and expenses, and will charge fees that are reasonable and commensurate with the services delivered and the responsibility accepted. We will not accept commissions, remuneration, or other benefits from a third party in connection with the recommendations to a client without that client's prior knowledge and consent, and will disclose in advance any financial interests in goods or services that form part of such recommendations.

Last updated February 15, 2021