

Code of Ethics

Stentam's set of rules and principles designed to encourage ethical conduct among a group of professionals.



STENTAM

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Introduction

Our Mission and Values: We never Compromise Our Ethics and Integrity

At Stenson Tamaddon, we are driven to bring innovative and result-oriented solutions to our clients—while never compromising our commitment to the highest standards of ethical conduct and integrity. Each of us plays a role in shaping our culture and protecting our hard-earned reputation and brand.

This Code of Ethics reflects our deep commitment to our people, clients, and brand, and it reflects our core values. By applying these principles every day, we will make smart business decisions, continue to build trust with our clients and partners, and foster our values-based culture of forward-thinking, partnership, ethics, and reliability.

This Code of Ethics is an investment—in our reputation, brand, and our team—and we are all shareholders. Every day, we all must strive to build trust within our teams, with our clients and partners, and with the community. We build this trust by always acting ethically and within the letter and spirit of the law. To that end, every employee must know, understand, and comply with our Code of Ethics and the policies incorporated into this Code.

If you have an ethical or compliance question or concern, I urge you to raise them through the StenTam Speak Up Program, as outlined in this Code.

Thank you for your dedication and all that you do.

Eric Stenson
Founder & CEO

Ryan Louis
Founder & Partner

At Stenson Tamaddon, we are driven to bring innovative and result-oriented solutions to our clients—while never compromising our commitment to the highest standards of ethical conduct and integrity.

Eric Stenson, Founder & CEO |

Ryan Louis, Founder & Partner

OUR VALUES

Forward-Thinking

Ethics

Partnership

Reliability

Always Act With Integrity

Why do we have a code of ethics?

StenTam and its leadership are committed to conducting our business in an accountable, transparent, and ethical manner. This Code sets forth our commitment to always doing the right thing and aids us in making good and ethical business decisions. Compliance with the law and this Code must guide all aspects of our business. We are all required to understand and comply with the obligations and standards outlined in the Code. Failure to comply may result in discipline, up to and including termination.

This Code of Ethics is our road map that guides how we conduct ourselves and govern our business and incorporates StenTam's policies, standards, and procedures.

Our goal is to act lawfully and ethically at all times. This Code and our underlying policies cannot address every situation that may arise, but by following the letter and the spirit of this Code and our policies, we can maintain and protect our reputation and achieve continued success. If the Code does not specifically address a situation or you are unsure about the right course of action, before acting, always consult with your supervisor or Legal.

Our Core Values

Forward-Thinking

We achieve results by being confident and candid about our business, and we protect our proprietary technology.

Partnership

We provide our customers with personalized, professional support, while always being honest and transparent.

Ethics

Trust is our bedrock principle. We treat others with respect and dignity, we are committed to making a positive difference, and we speak up when we see questionable or illegal conduct.

Reliability

We always do the right thing and act within the letter and spirit of the law while we continue to deliver value to our clients.

Our Code Applies to Everyone

This Code applies to everyone in our Company (without regard to geographic location), including subsidiaries, and we expect everyone with whom we do business will comply with our expectations.

The principles set forth in this Code must be at the core of every decision you make and every action you take.

When in doubt, ask! Asking a question is often the best way to determine if an action is lawful and to ensure compliance with applicable laws or StenTam policies. If you are unsure if a proposed action is appropriate, stop and seek guidance before you act!

StenTam's Chief Legal Officer is responsible for monitoring and enforcing this Code. Any waiver of our Code requires the prior written approval of the Chief Legal Officer, or his designee.

This Code does not constitute a contract, guarantee of employment, create any specific employment rights or other procedural or substantive rights.

Individual Responsibility - You are Part of Our Commitment to Compliance

We are all individually responsible for protecting our hard-earned reputation and brand. Your compliance with this Code and StenTam's policies, standards, and procedures is a crucial part of protecting our reputation and brand.

It is your responsibility to understand and comply with the Code and the policies that apply to the work you do and the decisions you make. If you violate the law, this Code, or Company policies, standards, and procedures, you will be subject to disciplinary or corrective action or other legal consequences. Disciplinary or corrective action may include counseling, additional training, termination, or other appropriate action. In addition, compliance with this Code and Company policies, standards, and procedures is an essential component of your performance reviews, eligibility for bonuses, and promotions. Finally, a violation of the law could result in criminal and/or civil penalties imposed by a government agency or court.

Faced with a Difficult Decision? Consider the Following:

- Is the action or decision legal and consistent with StenTam's code, policies, and any applicable law?
- Am I putting myself, others, or the Company's property or assets at risk?
- How will my action or decision look on the Internet, a newspaper, or in a courtroom?
- Will the action or decision harm StenTam's reputation or brand?
- Am I acting transparently, honestly, and truthfully?

Expectations

Learn, Understand, and Comply with the Code Of Ethics, policies, and all legal and regulatory obligations that apply to your duties.

Always Do The Right Things
No Exceptions!

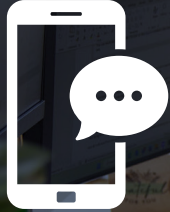
Lead By Example
Actively be part of StenTam's Culture of Compliance.

Speak Up
Prevent and report any actual or suspected violation.

Truthfully Cooperate
with any investigation or audit.

Training
Complete all required Ethics training and attest that you understand and will comply with the StenTam Code of Ethics.





StenTam's Speak Up Hotline

(855) 662-SAFE

Code: 8320806617

Remember, you can elect to remain anonymous.

Speak Up

If you see, hear, or learn of any actual or suspected violation of this Code of Ethics, Company policies, standards, or procedures, or the law, we want, encourage, and expect you to report it. Under StenTam's Speak Up Program, you can report in good faith—even anonymously—any actual or suspected violation, and StenTam is committed to providing a safe reporting environment.

To protect yourself, your teammates, and StenTam, any person who learns of or suspects a violation of this Code, Company policies, standards, or procedures, or the law or regulations in the jurisdictions where we do business, should report his or her suspicion promptly via the following channels:

- StenTam's Speak Up Hotline;
- StenTam's Legal Department;
- Human Resources; or
- Any executive, supervisor, or manager

We encourage reporters to provide contact information and the confidentiality of all reports will be respected and will be limited to only those people who have a legitimate reason to know. Nonetheless, we will always accept anonymous reports.

Why it Matters

Unreported misconduct can have severe consequences for you, your colleagues, and the Company. Undisclosed misconduct can result in significant financial consequences for StenTam, the loss of jobs to uninvolved employees, and criminal and/or civil sanctions for those involved.

Retaliation is Prohibited!

StenTam has **zero tolerance** for retaliation in any form. Anyone engaging in retaliatory behavior against those who make a report in good faith will be subject to disciplinary action, up to and including termination. StenTam will not retaliate or permit retaliation against a person who in good faith:

- Reports what he or she believes is a violation of our Code, our policies, standards, or procedures, or the law.
- Cooperates in an investigation of an actual or suspected violation.
- Raises a compliance question or seeks advice about a particular business practice, decision, or action.

Why it Matters

Employees should never be forced to choose between doing the right thing and their job. Retaliation causes good employees to remain silent, thus allowing misconduct to continue, and creating business and legal risk. Finally, under certain circumstances, retaliation against whistle-blowers can be a crime.

Click the button for StenTam's
Non-Retaliation Policy

Non-Retaliation

Ethical Leadership Matters

As a manager or supervisor, you are also responsible for:

- Creating a culture of compliance and serving as an example by acting with the highest ethical standards.
- Promoting a collaborative atmosphere and fostering an environment for raising questions and addressing compliance issues that come to your attention.
- Ensuring and confirming that your direct reports understand and apply the standards outlined in this Code and StenTam's policies, standard, and procedures.
- Setting, monitoring, and enforcing performance goals consistent with this Code, Company policies, standards, and procedures and regulatory obligations.
- Providing appropriate corrective action when this Code or StenTam's policies, standards, or procedures are violated.
- Enforcing and supporting StenTam's non-retaliation policy against any person who reports in good faith any suspected violation of law, this Code, or Company policies, standards, or procedures.



As a leader, integrity starts with you. We trust and expect our leaders to set and encourage an ethical tone through word and deed.

Mike Mitchell, Chief Legal Officer

Lead by Example

Encourage Ethical Decision Making

Prevent Retaliation

Reward Integrity

Foster a Safe Work Environment

Our Core Policies

All employees are required to learn and comply with StenTam's policies.

A summary of these policies are set forth below in the Code.
Click on the tile below to access the complete policy.

Conflicts of Interest

Business Gifts

Anti-Corruption

Safeguarding Company Property

Communicating w/
Public & Social Media

Privacy & Data Protection

Maintaining Accurate Business Records

Non-Retaliation

Bullying, Harassment, Discrimination

Anti-Money Laundering

Workplace Violence & Conduct

Conflicts of Interest

StenTam is committed to reducing and avoiding conflicts of interest. A conflict of interest is any situation or activity that involves, appears to involve, or creates the perception of a conflict between your personal or financial interests and StenTam's interests. A conflict of interest may interfere with your obligation to objectively and effectively perform your work in the best interest of StenTam. A conflict of interest may include participation in outside activities, personal interests, or financial interests.

- StenTam is committed to reducing and avoiding conflicts of interest and candidly, openly, and honestly communicating and interacting with its employees. Employees are expected to do the same when dealing with StenTam. No employee should have, or appear to have, an undisclosed conflict of interest, as defined by the StenTam Conflict of Interest Policy.
- When required by the StenTam Conflict of Interest Policy, you must report, in writing, a conflict or potential conflict of interest to the Chief Legal Officer, or his designee.

Why it Matters

Promptly disclose any actual or potential conflict of interest. If a conflict of interest exists, waivers will be considered and granted on a case-by-case basis.

Examples of Conflicts of Interest

Outside Activities

Engaging in any activity that competes, or appears to compete, with StenTam's interests, or affects your ability to devote appropriate time and attention to your job responsibilities, including secondary employment and or ownership or interest in a businesses.

Significant Personal Relationships

Hiring, supervising, or having a direct or indirect line of reporting to a family member, romantic partner, close friend, or having the ability to influence that person's employment opportunities or compensation.

Financial Interests

Working for, providing services to, having a financial interest in, or receiving any personal benefit from a current or potential client, third party, or competitor or having a family member who does—unless such interest is nominal, disclosed, and approved in writing.

For more information, see the StenTam's Conflict of Interest Policy.

Why it Matters

Every employee is expected to use his or her judgment to act, at all times and in all ways, in the best interests of StenTam. Compromised decisions undermine the success and legitimacy of our business and damage the trust and confidence of our stakeholders, clients, business partners, and employees. Avoiding or disclosing potential and existing conflicts of interests ensures that decisions are not the result of self-dealing or competing interests.

Business Gifts

StenTam competes for business and pursues business objectives solely on the merits. To that end, before you give or receive any business gift, you must ensure it is consistent with StenTam's Gift and Anti-Corruption Policies. Giving or accepting business gifts can create a real or perceived conflict of interest, can lead to a perception of favoritism, and an expectation of reciprocity that could compromise your objectivity, even inadvertently. Or, it could be viewed as a bribe.

What is a business gift?

It includes **anything of value** given by or on behalf of StenTam or received by an employee from a current or prospective client or business partner to build goodwill or further business relationships, **without expecting anything else in return.**

Exchanging business gifts with clients or business partners requires careful consideration by you and your manager to avoid any real or perceived attempt to inappropriately influence business decisions or gain an unfair advantage.

Gift Giving

StenTam is committed to maintaining ethical business practices, including when providing gifts, entertainment, and travel to potential business partners and third parties. Business gifts, including travel and entertainment, must be reasonable in frequency and expense, for a bona fide business purpose, and not to improperly influence decisions.

You are responsible for ensuring you know and comply with StenTam's Gift policy. When it comes to gift giving, here are some of your responsibilities:

Never offer or give any gift to government employees

The giving or offering of any business gift to any federal, state, or foreign government employee is prohibited. Even the offering of an inexpensive gift or meal to a government employee can be illegal.

Do not offer or give gifts to customers or business partners without prior approval

The giving of any business gift to a client or those that do business or seek to do business with StenTam (e.g., vendor, supplier, business partner, etc.) is prohibited, unless you have prior, written approval, consistent with StenTam's Gift Policy.

Never offer or give cash

The giving of lavish gifts, cash, cash equivalents, and gift cards is prohibited.

Use caution during contract negotiations and contract renewals

To avoid the perception of improper influence, do not offer or give business gifts during or close to contract bids, negotiations, or renewals.

Gift Receipt

As a general rule, StenTam employees shall not directly or indirectly seek or accept any payment, entertainment, gift, gratuity, or thing of value from any customer or any third party doing business with or seeking to do business with StenTam. Under no circumstances should you request or accept gifts, cash, or other benefits in exchange for influence over Company decisions.

This general rule contains certain exceptions, including the acceptance of reasonable and appropriate business-related meals, provided they are limited in frequency and expense, and commemorative items of nominal value (e.g., pens, calendars, and t-shirts).

Gifts that are contrary to the policy must be declined and returned whenever possible. If it is impossible or inappropriate to refuse or return a gift, you should notify your manager immediately after accepting the gift.

For more information, see StenTam's Gift Policy.

Why it Matters

Gifts, entertainment, and travel expenses can create opportunities for misconduct or and create the appearance that these items and services are provided to influence business or government decisions. Adhering to ethical business practices in making decisions or taking actions related to gifts, entertainment, and travel helps avoid the occurrence or appearance of impropriety.

Anti-Corruption and Anti-Bribery

StenTam does not tolerate any form of bribery or corruption. StenTam complies with all anti-bribery laws in every jurisdictions where we do business. We expect the same of you and all our business partners.

You must never offer, give, or facilitate the payment of any bribe, improper payment, or the giving of anything of value to improperly influence an official or business act or to secure an improper advantage to anyone, anywhere, for any reason. You must never accept anything of value that might affect your objectivity in doing your job.

“Anything of value” includes cash, gifts, hospitality (travel, meals and entertainment), donations, employment, sponsorships, or anything else that could be valuable to a recipient.

The offering or giving a bribe or improper payment to any government official or entity or to any third party, such as a customer, vendor, or business partner, is prohibited by this Code of Conduct and StenTam’s Anti-Corruption policy. **Violation of this policy may result in disciplinary action, up to and including termination of employment.**

For more information, see StenTam’s Anti-Corruption Policy.

Why it Matters

Corruption undermines the rule of law, the stability of the marketplace, the ability to successfully compete, and is totally inconsistent with our values. Violations of anti-bribery and corruption laws can result in serious financial consequences to StenTam, layoffs involving your fellow employees, and criminal consequences for those involved. For these reasons, StenTam prohibits bribery and corruption in all situations without exception.

Safeguarding Company Property and Resources (Including Intellectual Property and Use of Communications & Computer Systems)

Every employee is responsible for protecting StenTam's property and assets, including our physical property, money, and intellectual property and confidential information. Unless expressly authorized, never use StenTam property for personal reasons or to promote any business, product, or service that is not offered by the Company or that competes with StenTam. Theft, misuse, or the intentional or negligent damage or loss of Company property and resources, including intellectual property and confidential information, will not be tolerated.

Financial Resources and Physical Property

You are responsible for the proper use of StenTam's property and resources. That includes our buildings, products, computers, physical property, and money. StenTam relies on you to be honest and efficient so the Company can operate profitably and continue to bring innovative and result-oriented solutions to our clients. Your responsibilities include:

- Using Company money and property wisely and prudently, and protecting against fraud, waste, and abuse.
- Never steal, embezzle, or divert StenTam's money or property or engage in any fraudulent behavior—and never tolerate those who do.

Intellectual Property and Confidential Information

StenTam's intellectual property—copyrights, patents, trademarks, trade secrets, brand names and logos, research and development, inventions, proprietary software, processes, domain names, and social media accounts—is an invaluable asset that belongs to StenTam. Proprietary and confidential business information includes, but is not limited to, our financial information (including income, profits, losses, costs, expenditures, and pricing), business operations, and marketing information.

You are responsible for protecting StenTam's intellectual property and confidential information:

- Never share StenTam's intellectual property or confidential information, unless authorized to do so.
- Prevent loss, misuse, waste, or theft of StenTam's intellectual property or confidential information.
- Comply with any Confidentiality, Non-Disclosure, or Restrictive Covenants Agreements, including post-employment.

Why it Matters

Theft, carelessness, and loss of StenTam's money, physical property, and intellectual property can have a direct impact on StenTam's profitability, harm our reputation and brand, and impact our ability to retain and recruit the best employees.

Use of Communications and Computer Systems

The Company's communication and computer systems (including voice mail, e-mail, and internet systems) are intended primarily for business purposes; however, limited and reasonable personal usage is permitted if it does not hinder performance of job duties or violate any other Company policy.

It is strictly prohibited to use any StenTam communication and computer systems to do any of the following:

- To create, transmit, upload, download, or store any harassing, discriminatory, racist, offensive, obscene, pornographic, defamatory, or illegal materials.
- To engage in the unlawful duplication of copyrighted materials or computer software.
- To conduct any business unrelated to StenTam's business, including soliciting and gambling.

For more information, see StenTam's Safeguarding Company Property and Use of Communications and Computer Systems Policies.

Why it Matters

Theft, carelessness, and loss of StenTam's money, physical property, and intellectual property can have a direct impact on StenTam's profitability, harm our reputation and brand, and impact our ability to retain and recruit the best employees.

Communicating With the Public & Social Media

StenTam is committed to honest and accurate communications at all times. To ensure this accuracy, no employee is authorized to speak on behalf of StenTam, including in interviews or speaking engagements, without prior authorization from the CEO. If a member of the media contacts you, do not provide any information; instead, refer the reporter to your supervisor or to StenTam's Chief Legal Officer.

StenTam understands that social media can be a fun and rewarding way to share your life and opinions with family, friends, and co-workers around the world. Use of social media, however, presents certain risks and carries with it certain responsibilities. Accordingly, when outside of working hours, here are some basic guidelines that should apply to your online activities:

Be Honest and Accurate

Never represent yourself as a spokesperson for StenTam or speak on the Company's behalf. Always be honest and accurate. If you make a mistake, quickly correct it. Remember, content posted on the Internet can live forever.

Consider the impact

You are solely responsible for what you post online. Any content that constitutes a violation of this Code, StenTam policy, or law, or adversely reflects on StenTam may result in disciplinary action up to and including termination. You are responsible for knowing and following the rules.

Be Respectful

Always be respectful and courteous to others. Do not post offensive content meant to intentionally harm someone's reputation or posts that could contribute to a hostile work environment on the basis of race, sex, disability, religion, or any other status protected by law or Company policy.

Maintain StenTam's Confidentiality

Never disclose any personal information about employees, clients, business partners, or proprietary or confidential information (i.e., pending deals, legal disputes, pricing, technology, internal reports, or business-related communications).

Non-Retaliation

Do not use social media to retaliate against any person for making a good faith report of actual or suspected violation of law or policy.

For more information, see StenTam's Communicating with the Public & Social Media Policy.

Why it Matters

StenTam is committed to providing accurate, complete, and consistent information to the public, while maintaining our reputation and brand.

Protecting Privacy and Data

StenTam is firmly committed to protecting and using the private, personal data with which our customers and employees entrust us in a lawful and responsible manner. StenTam is committed to following all applicable privacy and data laws and honoring and protecting customers' and employees' information. The rules governing personal data vary significantly from jurisdiction to jurisdiction, but the fundamental commitment to respecting our customers' and employees' privacy is consistent.

As part of our business, StenTam collects and stores information received from and concerning our employees, clients, and business partners. StenTam is committed to protecting the privacy of our employees, clients, and business partners and complying with all applicable laws, regulations, and Company policy. Further, every employee must ensure the following:

- Only collect and store information for legitimate business purposes.
- Only disclose information as authorized by your job duties and only to those permitted access to the information;
- Protect all information entrusted to StenTam and immediately report any security violation, any actual or attempted compromise or unauthorized access of any computer or information, or the loss of data or information.

For more information, see StenTam's Protecting Privacy and Data Policy.

Why it Matters

The responsible use of data helps us maintain the trust of clients who provide their business data and employees who provide their personal information. Ensuring data is appropriately and responsibly used also avoids potential violations of data protection laws that can have serious financial and legal consequences for both StenTam and our employee.

Maintaining Accurate Business Records

StenTam is committed to maintaining accurate, timely, and complete business records. Keeping accurate and honest records protects our brand and legal interests and greatly enhances our operations. Accordingly, StenTam accurately and transparently records all transactions and expenditures.

In addition, proper record-keeping requires that the relevant records are maintained accurately, securely, and for a designated period. By policy, we maintain records only as long as necessary for a legitimate business purpose or as legally required.

For more information, see StenTam's Maintaining Accurate Business Records and Retention Policy.

Why it Matters

Proper record-keeping is one of the core elements of transparent business conduct and vital to operating a business with integrity and maintaining compliance with laws and regulations. Inaccurate or missing records can have grave legal and financial consequences for both StenTam and our employees.

Anti-Money Laundering

Money laundering is the process where money from a crime (like human trafficking, fraud, and drug dealing) is moved through a legitimate business to hide the criminally derived money. StenTam will never knowingly engage in money laundering, and we take active measures to prevent our business from being used to facilitate such illegal conduct.

Be responsible and look for money laundering red flags:

- Payments or documents from unknown third parties not a party to any of our contracts.
- Requests to circumvent normal processes or controls.
- Payments from nonbusiness or suspicious accounts.
- Requests to make large cash payments.

For more information, see StenTam's Anti-Money Laundering Policy.

Why it Matters

Money laundering is a federal and state crime that carries significant penalties. These penalties include large fines, criminal and civil forfeiture, imprisonment for individuals, and reputational harm.

Fair Competition

StenTam is committed to engaging in fair competition and competing on the merits of our products and services. Coordination with competitors undermines the free market and ultimately hurts StenTam, our investors, and the public. Our competitive advantage has always been our superior people and services. We never engage in unethical or illegal business practices, unfair or anti-competitive practices, or use deception or misrepresentation to gain an unfair advantage. Such conduct is strictly prohibited.

You must never:

- Enter into any discussions or agreement (whether formal or informal) with any competitor or potential competitor related to setting prices, fees, or other terms of sale or allocating customers or sales territory.
- Obtain business intelligence by illegal or unethical means.
- Engage in any bid-rigging.

Why it Matters

Competition benefits both consumers and society by driving innovation and expanding the number and quality of products at economical prices. Compliance with antitrust laws and the principles of competition is good business—it helps StenTam avoid severe penalties and other significant consequences like criminal liability for those undermining the competitive marketplace and layoffs of innocent fellow employees.

Our Workplace

All employees are required to learn and comply with StenTam's policies.

Bullying, Harassment, Discrimination

We treat every person with respect and dignity. StenTam is dedicated to maintaining a positive, creative, diverse, inclusive, and supportive work environment. StenTam provides equal employment opportunities to all qualified candidates and employees and never tolerates any form of discrimination, harassment, or bullying against or by any employee, applicant, or business partner based on race, gender, religion, sexual orientation, gender identity, national origin, age, pregnancy, physical or mental disability, military/veteran status, marital status, political affiliations, or any other consideration made unlawful by applicable law.

If you experience, observe, or suspect any discrimination, harassment, or bullying, speak up and report it through StenTam's Speak Up Program—even anonymously.

For more information, see StenTam's Bullying, Harassment, Discrimination Policy.

Why it Matters

Every person is entitled to be treated with dignity and respect. StenTam believes that diverse skills, experiences, and backgrounds makes us all collectively better.

Workplace Violence and Conduct

StenTam has a zero-tolerance policy for workplace violence or other disruptive behavior. Employees are prohibited from engaging in any act that could cause another individual to feel threatened or unsafe, including physical or verbal assaults, fighting, threats, or any expressions of hostility, intimidation, or aggression.

StenTam also prohibits the possession of dangerous or unauthorized materials, such as firearms or explosives, in the workplace; the possession, distribution, sale, transfer, or use of illegal, unauthorized drugs in the workplace or while on duty; or working under the influence of alcohol or illegal, unauthorized drugs.

For more information, see StenTam's Workplace Violence and Conduct Policy.

Why it Matters

StenTam endeavors to create a collegial, productive, and fun work environment that is comfortable and safe for all.

Training

All employees are required to learn and comply with StenTam's policies.

Training is a vital part of compliance and helps you do your job correctly. All employees are required to take compliance training. The training discusses this Code and gives you information about the laws and regulations applicable to our business.

Many functions within StenTam (such as sales and marketing, billing and reimbursement, etc.) require additional specialized training. You will be notified if your position requires this additional training. You must complete all required general and specialized training as a condition of your employment.

After you complete the training, you attest that you understand and commit to comply with the Code. Failing to read or attest to the Code does not excuse you from these responsibilities.

Why it Matters

StenTam aims to be a thought leader in tax technology. Organizing and hosting education and training events ethically and with integrity furthers that goal.

Want to Speak Up?

StenTam's Speak Up Hotline

(855) 662-SAFE

Code: 8320206617

Remember you can elect to stay anonymous.

Compliance Certification

By checking this box and signing this document, you acknowledge the following:

I have received, read, and understand StenTam's Code of Ethics.
I agree to comply with all applicable laws, regulations, and the
Company's Code of Ethics, policies, and procedures.

Conflict of Interest Declaration

Please declare any conflict of interest (e.g., self or spouse working
for or having a financial interest in a competitor or client):

Print Name

Signature

Date

Modification of Waiver

Any request for an exception, modification, or waiver of this Code of Ethics or any policy must be submitted in advance in writing. Any request may only be approved by StenTam's Partners or Chief Legal Officer.



STENTAM