



# CODE OF ETHICS AND BUSINESS CONDUCT

## OUR MISSION

AMALIE IS COMMITTED TO PROVIDING A DIFFERENT KIND OF CONSULTING SERVICE TO OUR CLIENTS, FOCUSED ON PRACTICAL AND SUSTAINABLE SOLUTIONS FOR PROGRAMS AND MANAGED SERVICES THAT CREATE BUSINESS EFFICIENCIES WHILE MITIGATING COMPLIANCE RISKS.

## OUR VALUES

To achieve our mission, we will:

- Act with **INTEGRITY**
- Strive for **EXCELLENCE**
- Treat everyone and everything with **RESPECT**
- Deliver **PRACTICAL SOLUTIONS**

## PURPOSE

Amalie Trade Compliance Consulting, LLC ("Amalie") is committed to ethical and fair business practices. We believe honest and ethical behavior is critical to our success. Our Code of Ethics and Business Conduct is a guide for making sound decisions in complex situations, as well as the foundation of how we do business and the values we practice each day.

Anyone representing Amalie, including all employees, contractors, agents, vendors, consultants, subcontractors, and business partners ("representatives"), is required to read and understand our Code and other company policies. Keep in mind that our Code reflects general principles; it is not intended to address every situation.

Anyone who becomes aware of a potential violation of our Code can and should bring it to the attention of the President, the Chief Operations Officer, Human Resources, or any manager, without fear of retaliation.

## COMMUNITY

### FAIR EMPLOYMENT, DIVERSITY, AND INCLUSION

*Amalie is committed to treating everyone with RESPECT and providing a workplace environment free of harassment and bullying.*

We prohibit discrimination or harassment against any employee or representative based on race, color, religion, national or ethnic origin, sex (including pregnancy), sexual orientation, gender identity, age, disability, veteran status, or other characteristics protected by law.

### HEALTH, SAFETY, AND ENVIRONMENT

*Amalie is committed to providing a safe and healthy workplace environment.*

We insist on taking care of each other and ourselves above all else, including always promoting safe practices and a healthy life balance.

### HUMAN RIGHTS

*Amalie is committed to respecting human rights everywhere we operate.*

We comply with all laws pertaining to freedom of association, collective bargaining, immigration, working time, and wages and hours labor laws. We prohibit forced, compulsory, and child labor, and trafficking in persons.

## COMPLIANCE WITH LAWS AND REGULATIONS

Amalie is based in the United States of America and, as a result, U.S. laws govern our business operations and conduct. However, due to the global reach of our business activities, we may be subject to the laws and regulations of other countries as well. Anyone who directly or indirectly performs, facilitates, condones, or approves of any illegal or unethical conduct will be subject to disciplinary actions or separation of the employment or business relationship.



## COMPLIANCE WITH LAWS AND REGULATIONS (Continued)

### GLOBAL TRADE REGULATIONS

*Amalie is committed to complying with all U.S. and other applicable laws and regulations while supporting cross-border transactions.*

We operate around the world and respect both international and local sanctions regimes that prohibit us from doing business with certain countries, individuals, governments, and entities.

### ANTI-CORRUPTION

*Amalie discourages giving or accepting any gift, hospitality or service that could create or imply impropriety.*

We prohibit bribery in any form for the benefit of any internal or external party, including public officials and suppliers. We prohibit facilitating payments.

### ANTI-MONEY LAUNDERING

*Amalie will not accept, process, or aid in a transaction involving money gained through criminal activity.*

We prohibit any activity by an Amalie employee or representative, either alone or in collaboration with third parties, that violates applicable regulations on money laundering or terrorist financing.

### LOBBYING

*Amalie does not provide lobbying services.*

We will not engage in any lobbying activity without understanding the applicable rules and required disclosures. The term “lobbying activity” covers many activities, including certain interactions with legislators, regulators, executive branch officials or staff. Any questions or concerns should be immediately directed to the President or Chief Operations Officer.

## CONFLICT OF INTEREST

*Amalie is committed to providing services free of undue influences.*

We require the full and undivided dedication and efforts of all our employees and representatives, including the avoidance of, or the appearance of, any personal, financial, or other conflict of interest, that may hinder capability or willingness of performance. A conflict of interest is where you are at risk of putting your own interests, or those of someone else, ahead of the interests of Amalie or our clients. We need to carefully consider any situation that could be considered unfair and ensure it does not impact our ability to make balanced and reasonable decisions.

## DATA PROTECTION AND PRIVACY LAWS

*Amalie is a trusted custodian of client and colleague data and will prioritize adherence to data privacy laws.*

We expect employees and representatives to fully comply with all legislative requirements as they relate to information assets. Data is fundamental to the services we offer. The way we handle data could impact not only our business and reputation, but also that of our clients. We all must consider our actions when dealing with the data of our clients and/or our colleagues and treat it with the value and care it deserves, including protecting data from loss, theft, and accidental disclosure.

## RECORD MANAGEMENT

*Amalie will always truthfully and effectively manage records.*

We require all employees to adhere to a recordkeeping system to ensure the proper handling and accessibility of client data. Managing records is a crucial component of being a trusted partner to our clients and business partners. Effectively managing records allows us to meet business needs and ensure records are readily available when needed. It will also allow us to preserve any documents if required by investigation, audit, or litigation. Records include all electronic, email, image, and paper documents created, received, or maintained and used by Amalie and/or our clients. We prohibit creating or condoning the creation of a falsification of any record or the destruction of any record for a dishonest purpose. In addition, every piece of data or information that we submit to our clients – including time tracking, expense reports, and engagement documentation – must be honest, accurate, and complete.

## AWARENESS AND REPORTING

*“The chances of us getting found out are small so...”*

*“It might not be totally above board but...”*

Comments such as these can give mixed messages about our values. We should be conscious to combine messages of delivering for our clients and/or hitting business goals with our absolute commitment to always act with the highest ethics and care.

Not Sure? Ask yourself:

- Does it reflect our values?
- Does it meet regulatory or legal requirements?
- Would I feel okay if everyone knew about it?

If you answer “No” or “Not sure” to any of these questions, you should stop and ask for help. It is always okay to ask for help!

**If you need to ask for help or report a concern, contact the President, the Chief Operations Officer, or follow the procedures in the Employee Handbook. Amalie will not tolerate any form of retaliation against individuals who report unacceptable conduct to management or who cooperate in an investigation.**

## QUESTIONS OR CONCERNS

Any questions about our Code or what laws you should abide by when making business decisions should be directed to the Chief Operations Officer.