

DJE Holdings¹ (“DJE”) is committed to maintaining high ethical standards in our business, whether conducted internally by DJE employees or externally by the third parties that we engage. This Code of Ethics for Suppliers and Service Providers is intended to ensure that subcontractors, freelancers, suppliers, and other third parties (“Our Suppliers”) understand and agree to meet these same standards. In agreeing to provide goods or services for DJE or DJE clients, Our Suppliers hereby consent to compliance with the following standards in all business dealings related to DJE.

Our Suppliers are expected to communicate these standards to all applicable individuals performing services for DJE or our clients. Questions, concerns, or potential violations of these standards must be communicated to the DJE account team, the DJE Global Compliance Officer [Randall Corley](#), DJE’s [Compliance Department](#), or the DJE [Listen Line helpline](#) (access code: DJE).

DJE IS COMMITTED TO HONESTY

We build trust with the public by providing all information necessary for informed and responsible decision making.

- **Communications -**
 - We must adhere to the highest standards of accuracy and truth in advancing the interests of our clients and in communicating with the public.
 - We do not intentionally disseminate false or misleading information or omit critical information that is essential to avoid misinformation.
- **Documentation -**
 - We take reasonable steps to evaluate the reliability and basis for claims, or other information, before releasing it on behalf of our clients.
 - We act promptly to coordinate with our client to appropriately respond to any erroneous communications for which we are responsible.

DJE IS COMMITTED TO TRANSPARENCY

While a lack of transparency can sometimes yield short-term results, it can call into question the integrity of communications and create an unacceptable level of risk for our reputation and that of our clients. Our Suppliers must not act in any way that may appear to be an attempt to deceive public opinion when performing services for DJE or our clients. The following are just a few examples of how Our Suppliers should display transparency:

- By proactively disclosing their identity and affiliation with DJE and the client they may be serving when communicating through blogs or other online media.
- By refusing to pay or provide any other hidden reward in exchange for an expectation of coverage.

DJE IS COMMITTED TO FAIR DEALING

We deal fairly with clients, competitors, peers, vendors, public officials, the media, and the general public. Promoting healthy and fair competition among professionals preserves an ethical climate while fostering a robust business environment.

¹ Daniel J. Edelman Holdings, Inc. includes Daniel J. Edelman, Inc., StrategyOne, Inc. d/b/a Edelman Intelligence, Zeno Group, Assembly Media, Matter, Inc., United Entertainment Group Holdings, LLC (UEG), The K Group Public Relations Company, d/b/a Krispr Communications, Edible, Inc., Edelman Miami Latin America Corp., The H & W Group, d/b/a Salutem, The R Group Public Relations Company, d/b/a Revere, First & 42nd, Inc., and all operating companies under the Edelman family of companies (collectively referred to as “DJE Holdings” or “DJE” in this document)

- **Improper Incentives** - Our Suppliers must not directly or indirectly offer bribes, kickbacks, or anything else of value that could be interpreted as an attempt to fraudulently or unethically obtain or retain business on behalf of DJE. Business gifts and entertainment must meet applicable legal, ethical, and cultural norms to preserve the free flow of unprejudiced information.
- **Intellectual Property** - Our Suppliers must respect and preserve intellectual rights in the marketplace.
- **Confidential Information** - The nature of our work often gives us access to confidential information that is not available to the public, which, if disclosed, could be useful to competitors or harmful to us or our clients.

Our Suppliers must protect confidential, “insider,” or other sensitive information related to DJE and current, former, and prospective clients. They may not use such information to further their own interests or in violation of applicable insider trading regulations.

DJE ENSURES BUSINESS ACTIVITY ALIGNS WITH THE INTERESTS OF ALL STAKEHOLDERS, CLIENTS, EMPLOYEES, AND PARTIES WITH WHOM WE INTERACT

We serve the public interest by acting as a responsible advocate for our clients. We provide a voice in the marketplace for ideas, facts, and viewpoints that facilitate informed public debate and decision-making. Our Suppliers’ business activities should be guided by a balanced consideration of the interests of all stakeholders, including our clients, employees, and the general public. Our Suppliers may not unduly favor the interests of one to the detriment of another, or of society at large. Care must be taken to avoid any action that may discredit our client, DJE, or our profession.

- **Rules of Engagement** – Our Suppliers must respect the customs, rules, practices, and codes of conduct that apply to our industry and practice areas in all countries where we operate, including those related to our clients, colleagues, and fellow professionals. Our Suppliers must act in a manner that preserves the integrity of the channels of public communications that are used, and respect the independence, rights, rules, and guidelines established by the information media.
- **Human Rights** - Our Suppliers must support and respect the free exercise of human rights, not only those in the workplace but also those relating to the freedom of speech and of association, which affect the right of the individual to give and receive information. Compensation, working hours, and minimum age requirements all meet applicable regulatory standards. Forced or involuntary labor may never be used. Employees must be treated with dignity and respect and provided with a work environment that is free from discriminatory practices, harassment and abuse based on: race, color, religion, creed, gender, nationality, ancestry, citizenship, political affiliation, sexual orientation, disability, age, gender identity or expression, genetic information, pregnancy, personal appearance or family responsibilities; or on protected veteran, military, parental or marital status, or any other protected status.
- **Conflicts of Interest** - Our Suppliers must avoid actions and circumstances that appear to compromise good business judgment or that create real, potential, or perceived conflicts between personal and professional interests when performing services for DJE or our clients.

Our Suppliers are required to notify DJE of any relationships they have with any DJE employee, officer or director, or any other potential conflicts that may be identified.

- **Health and Safety** – Our Suppliers must provide a safe and healthy work environment for their employees.
- **Environment** – DJE encourages Our Suppliers to consider the environmental impact of goods and services provided in business dealings with DJE. This includes, but is not limited to, minimizing carbon footprint through effective travel, use of recycled materials and recycling of waste products, responsible wastewater and solid waste disposal, resource utilization reduction, and so on.
- **Sustainable Development** – In accordance with the DJE Sustainable Procurement Policy, DJE expects Our Suppliers to conduct business ethically, be committed to supplier diversity, and be aligned with [U.N. Sustainable Development Goal #8](#), which focuses on promoting inclusive and sustainable economic growth, full and productive employment, and decent work for all.

DJE STRIVES TO MODEL BEST PRACTICES IN ALL AREAS OF OUR BUSINESS

We acquire and responsibly use specialized knowledge and experience, and in doing so build mutual understanding, credibility, and relationships among an array of institutions and audiences.

- **Qualifications and Expertise** - Our Suppliers should only accept work for which they are suitably skilled and experienced. Where additional expertise is required, they should collaborate with the DJE account team to determine the best means of obtaining the necessary skill base or resources to serve our clients' needs. Our Suppliers should stay informed and educated about practices in the profession to ensure ethical conduct and delivery of quality products and services for DJE and its clients.

DJE DOES NOT VIOLATE LEGAL OBLIGATIONS

Obedying the law, in letter and spirit, is the foundation on which DJE's ethical standards are built. In providing goods and services to DJE or our clients, Our Suppliers must respect and obey the laws of the nations, regions, and cities in which they operate. Our Suppliers acknowledge that DJE is incorporated in the United States and are therefore aware that services provided to DJE or its clients are subject to all applicable local and regional laws and regulations as well as those of the United States.

- **Anti-Corruption** - In conducting business for DJE and its clients, Our Suppliers are expected to comply with applicable anti-corruption and anti-money laundering statutes. As such, Our Suppliers must ensure that no payment, gift, contribution, bribe, rebate, payoff, kickback, or anything else of value is offered, authorized, promised or paid, directly or indirectly, in order to (i) obtain or retain business for or with, or direct any business to, any entity or individual; (ii) obtain favorable treatment, special concessions or other improper business advantage; (iii) influence that person to act, make a decision, exercise discretion, pass judgment, fail to act, or make an omission in breach of a duty of good faith, impartiality or trust ("Acting Improperly"); or (iv) otherwise reward that person for Acting Improperly.

Our Suppliers further represents that they understand and agree to comply with the provisions set forth in the [Summary of Global Anti-Corruption Statutes Applicable to DJE Offices Worldwide](#) and the DJE [Anti-Corruption Policy for Third Party Business Relationships](#).

- **Privacy and Data Protection** - Our Suppliers are expected to comply with all applicable data protection and privacy laws and regulations, including the E.U. General Data Protection Regulation (GDPR) and other such laws related to the collection, storage, transfer and processing of personal data.
- **Economic Sanctions** - DJE complies with trade sanctions that apply to our business in all countries and applicable jurisdictions, including those enforced by the U.S. Office of Foreign Assets Control (OFAC). In agreeing to do business with DJE, Our Suppliers hereby certify that neither they nor their beneficial owners are included on the OFAC Specially Designated Nationals (SDN) list, nor any other blocked party or debarment listing that may be applicable and may impact DJE or its clients' ability to do business with Our Suppliers.

NOTE: Subject to applicable law, should a non-English translation of this document have a conflict of language with the English version, the English version shall prevail.