



Criteria Corp Code of Conduct

(Revised May 23, 2025)

Criteria Corp (“**Criteria**”) strives to provide the best possible evidence-based employment testing and assessment software as a service (collectively the “**Service**”) to our customers and is committed to earning and maintaining the trust of our customers, personnel, and stakeholders through honesty, transparency and respect. This Criteria Corp Code of Conduct (“**Criteria Code**”) summarizes the values and principles that Criteria prioritizes in connection with its Service and in promoting ethical conduct and responsible business practices.

- 1) **COMPLIANCE WITH LAWS:** Criteria’s commitment to integrity begins with complying with laws, rules and regulations where we do business. Criteria will adhere to the national and/or local laws and regulations applicable to the Service.
- 2) **RESPECTFUL WORKPLACE ENVIRONMENT AND PRACTICES:** Criteria respects human rights and promotes equal opportunity in its hiring practices, makes recruiting decisions based solely on job-related requirements and does not use forced labor. Criteria hiring practices include verification of minimum age and ability to work. Criteria pursues compliance with legally mandated limitations on minimum hiring age; wage, hour and benefit requirements; and applicable safety rules and practices. At Criteria, we treat others with respect and dignity. This means that persons working for Criteria are entitled to work in an environment that is free of harassment, bullying and discrimination.
- 3) **INTERNATIONAL BUSINESS:** Criteria is committed to the highest ethical standards in all business transactions. Criteria will not tolerate, permit, or engage in bribery, corruption or unethical practices whether in dealings with public officials or individuals in the private sectors. Criteria also expects its business partners to conduct business for Criteria in compliance with all applicable laws; avoid engaging in any activity which could be deemed a corrupt and/or unethical practice; and maintain accurate and transparent records of matters relating to their business with Criteria.
- 4) **GIFTS AND ENTERTAINMENT:** Giving and receiving gifts or entertainment may be a common business practice, but cannot compromise, or appear to compromise, Criteria’s ability to conduct ethical and lawful business. Criteria prohibits giving or accepting gifts or entertainment exceeding nominal value to or from its customers or business partners. This applies to Criteria personnel, contractors, business partners and each of their immediate family members. No gift or entertainment is permitted if it is cash; offered or exchanged with a representative of any government or public entity; prohibited under applicable law or rule; or viewed as an inducement or reward for a Criteria business decision.

- 5) **ANTI-BRIBERY AND ANTI-CORRUPTION:** Criteria shall not engage in any form of corrupt practices, including but not limited to extortion, fraud, or bribery. Criteria shall:
- a. Prohibit bribery and corruption in all business transactions, as such that may compromise the principles of fair competition or constitute an attempt to obtain or retain business or influence the course of business or governmental decision-making processes;
 - b. Not allow any employee to suffer negative consequences for voicing a concern or refusing to engage in an act of bribery;
 - c. Prohibit acceptance of payments, gifts in kind, expenses, discounts, advantages or promises such that may influence the course of business decisions;
 - d. Have appropriate systems in place to manage bribery risk;
- 6) **CONFLICTS OF INTEREST:** Criteria personnel and business partners are expected to act in Criteria's best interests when performing work for Criteria. As such, Criteria personnel and business partners will not engage in any activity which could create a real or perceived conflict of interest.
- 7) **PROPRIETARY INFORMATION:** Criteria respects the property rights of others. Criteria will refrain from the unauthorized use or access to confidential information or intellectual property of others. Criteria confidential information is considered a valuable asset to be used only for business purposes and kept in strict confidence. This responsibility extends to confidential information of others that Criteria receives under non-disclosure agreements.
- 8) **SOURCING:** Criteria requires all business partners that provide goods and services to share its commitment to the Criteria Code.
- 9) **MONITORING AND ENFORCEMENT:** Criteria expects its personnel and business partners to support compliance with the Criteria Code. Business partners that provide goods and services should maintain documents to demonstrate compliance with the Criteria Code and make such documents available to Criteria upon request. We expect our personnel and business partners to speak up and report when standards in this Criteria Code have not been met. Criteria will not tolerate retaliation against individuals that raise concerns or questions regarding a potential violation of the Criteria Code.

