

MAXIMUS®



Standards for  
**Business Conduct  
and Ethics**

May 2019

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## Letter from the Chief Executive Officer

Dear MAXIMUS colleague,

Through the years, MAXIMUS has earned a reputation for service excellence and an unwavering commitment to the highest ethical principles and values. To maintain this reputation, we must consistently demonstrate the highest standards of accountability, integrity, responsibility and ethics in our daily activities, across the organization and around the globe.

This guide contains the Standards for Business Conduct and Ethics that all of our directors, officers, employees and consultants must follow. Ethics at MAXIMUS is more than simply following a particular rule or law; it's a shared commitment to hold each other accountable to the highest standards of business conduct. All of these standards are based on the common-sense principle of *doing the right thing, all the time*.

Please take the time to read through and become familiar with the standards. If you ever find yourself in a situation where you are not sure of the *right thing to do*, or if you have a question about a specific standard, contact the appropriate individual in the Key Contacts section at the end of this guide.

Thank you for your continued commitment to the highest levels of excellence and integrity.

Sincerely,



Bruce Caswell

President and Chief Executive Officer

## About this guide

There are five sections to this guide:

**Section 1** Gives basic information about the MAXIMUS philosophy and explains our Company commitment to ethical conduct.

**Section 2** Lists the principles of professional ethical conduct that all MAXIMUS employees must follow.

**Section 3** Describes the basic elements of our Compliance and Ethics Program.

**Section 4** Gives detailed information for each of the ten Standards for Business Conduct and Ethics.

**Section 5** Lists resources and key contacts for reporting violations and getting guidance.

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## Section 1 Company Philosophy and Commitment to Ethical Conduct

### Our shared commitment to ethical behavior

Since 1975, MAXIMUS has operated under our founding mission of *Helping Government Serve the People.*<sup>®</sup> We have a reputation for ethical behavior and high-quality services to clients. We require all MAXIMUS employees to conduct business honestly, fairly, legally and ethically.

Officers or directors asking for any waivers of these standards must get approval from the MAXIMUS Board of Directors. Other employees must give waiver requests to the Compliance Officer.

You must follow these standards and report any violations to continue working at MAXIMUS. MAXIMUS will take remedial or disciplinary action against anyone who violates the standards and related laws.

This guide will help you follow our ethical and legal standards. If the standards do not cover a particular situation, contact one of the resources listed below (*see Reporting Ethical Violations*).

You must acknowledge that you have read, understood, and agree to follow these standards.

## Reporting ethical violations

As a MAXIMUS employee, you must report any suspected ethical violations. You may speak to your supervisor or contact:

- Senior management in your local project, department, business unit or segment
- Your local human capital or human resources department
- U.S. Corporate Compliance Officer
- U.S. Corporate General Counsel
- U.S. Corporate Audit Committee
- MAXIMUS Ethics Line (1.844.592.2218)

See Key Contacts at the end of this guide for more information.

If you're not sure where to send your report, email the Corporate Compliance Officer at **complianceofficer@maximus.com**. Or, in the U.S., you can call **703.251.8481**.

## Confidentiality of reporting

We will do our best to keep your report confidential. Keep in mind:

1. We prohibit retribution or retaliation against anyone who reports suspected unethical behavior in good faith.
  2. Employees who deliberately make a false accusation in order to harm or retaliate against another employee will be subject to disciplinary action, including ending employment.
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## Section 2

### MAXIMUS Basic Principles of Ethical Conduct

Everyone at MAXIMUS — employees, directors, officers and consultants — must follow professional and ethical standards of conduct.

1. We conduct our business affairs honestly, fairly and ethically.
2. We follow all applicable laws, regulations and contractual obligations when conducting business.
3. We avoid any actions that may create the appearance of unethical or illegal behavior.
4. Our daily conduct reflects the highest level of integrity and ethics in dealing with each other, our customers and clients, our shareholders and the general public.
5. We make every effort to create a safe workplace.
6. We view each other as valuable members of the team and treat one another with respect and dignity.
7. We extend fair employment practices to every member of the MAXIMUS community.
8. We avoid conflicts of interest between work and personal affairs.

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## Section 3

### MAXIMUS Compliance and Ethics Program

The MAXIMUS Compliance and Ethics Program outlines the highest standards of ethical conduct. It includes the Standards of Business Conduct and Ethics and separate policies and procedures.

Our Program has these seven elements:

#### **1. A formal structure for overseeing compliance**

We have a Compliance Officer and a Compliance Committee made up of senior management representatives who oversee our compliance.

#### **2. Written standards and policies and procedures to promote compliance**

We have Standards of Business Conduct and Ethics and policies and procedures that guide us in complying with applicable laws and regulations.

### **3. Effective training and education to promote compliance**

We have training programs to make sure all employees understand our standards for ethical conduct and the laws and regulations that govern our business.

### **4. Effective lines of communication for reporting suspected violations**

- We require all employees to report good-faith concerns about actual or suspected non-compliance with applicable laws, regulations, standards, policies and procedures.
- We have reporting methods, including an anonymous confidential Ethics Hotline that is available 24 hours a day, 7 days a week. To learn more, see Key Contacts at the end of this guide.
- We try to keep reports of suspected violations confidential while investigating and fulfilling our reporting duties.
- We prohibit retribution or retaliation against anyone who, in good faith, reports suspected violations of our standards, policies, procedures or applicable laws or regulations.
- We take disciplinary action when an employee deliberately makes a false accusation. Disciplinary action can include ending employment.

### **5. Internal monitoring and auditing**

- We monitor and audit internal activities to evaluate whether they follow our policies, procedures and applicable laws and regulations.
- We evaluate all reported compliance concerns. We investigate and report the findings to the Compliance Committee and the MAXIMUS Board of Directors.
- We require all employees to cooperate with investigations.

### **6. Prompt response to detected problems and corrective actions**

We investigate all compliance issues. When appropriate, we promptly begin corrective action, such as:

- Notifying a governmental agency
- Taking disciplinary action
- Giving further training to employees
- Creating system changes
- Creating new Compliance and Ethics Program policies and procedures to prevent future similar violations

## 7. Well-publicized disciplinary guidelines

We take corrective action when an employee violates the Standards of Business Conduct and Ethics or MAXIMUS Compliance and Ethics Program Policies and Procedures. The type of corrective action depends on what the violation was, how severe it was, and how many times it happened. Disciplinary action may include ending employment and referring the matter to law enforcement.

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## Section 4 Standards of Business Conduct and Ethics

### Standard 1

#### **Compliance with Laws and Regulations**

MAXIMUS employees must follow all applicable laws and regulations at all times. When a law or regulation is violated, there may be severe financial penalties or other sanctions for the Company and the persons involved.

You must promptly report any activity by a colleague or consultant that appears to violate applicable laws and regulations, contract obligations, or MAXIMUS policies and procedures.

You may face disciplinary action if you don't report a suspected violation.

If you are not sure if something is a violation, contact your supervisor or one of the Key Contacts listed at the end of this guide.

### Standard 2

#### **Compliance with Government Rules and Contract Requirements**

Our main business relationships are with government organizations. There are often unique, specific legal or contractual rules. To make sure we comply with all government rules, MAXIMUS will identify and understand the legal and contract requirements relevant to our business.

MAXIMUS employees must follow all requirements associated with government contracts and transactions.

We must be truthful and accurate when dealing with government officials and agencies. We must submit accurate and complete data, and charge correct and authorized costs.



### **Timesheets and Direct Costs**

If you complete a timesheet or invoice, the time must be charged to the proper account and must accurately reflect the work you've done. You must make payments to vendors only for work the vendors actually performed.

### **Financial Statements**

If you prepare financial statements, you must use generally accepted accounting principles. You must have internal accounting controls to make sure all transactions are properly recorded, valued, summarized and disclosed.

You may not establish any fund or asset for any purpose that you do not tell us about or record.

### **MAXIMUS Invoices**

MAXIMUS invoices must accurately reflect work performed. Invoices must match timesheet records.

## Standard 3

### **Anti-trust and Fair Competition**

MAXIMUS must use fair competitive practices and obey related anti-trust laws. Meetings and agreements with actual or potential competitors present significant risk. Coordinate them through the MAXIMUS General Counsel.

You must take special care in these areas:

- **Price Fixing**

We will not enter into any agreements, understandings or arrangements with competitors to raise, lower, fix or stabilize prices.

- **Collusion**

In preparing and submitting bids and proposals for the sale of our services, we will not directly or indirectly enter into any understanding or arrangement with any other bidder or competitor for the purpose of reducing competition.

- **Anti-competitive Practices**

We will not agree to allocate territories, markets or customers; artificially limit services; or boycott a customer or supplier.

- **Reciprocal Dealings**

We will not agree to buy a product or service from a supplier on the condition that they buy a product or service from us.

- **Tying Arrangements**

We will not require our customers to purchase other services as a condition of receiving services they want.

### **Proper Marketing and Procurement Practices**

As a government contractor, MAXIMUS must follow ethical business practices related to marketing and procurements.

### **Competitive Analysis**

MAXIMUS employees who review the services and prices of our competitors must use publicly available information only. This includes:

- Materials available under public disclosure laws
- Published articles
- Market analyses
- Reports
- Websites

If you receive a competitor's trade secrets or other confidential information without proper authorization, you may face civil and criminal penalties.

You may not:

- Seek proprietary or confidential information if doing so violates a contractual agreement (such as a confidentiality agreement with a former employer)
- Hire a competitor's employees just to get proprietary or confidential information
- Accept information that is not public from a prospective client
- Give our competitors, or outside parties, confidential Company information
- Help competitors compete against MAXIMUS

## **Marketing Plans**

MAXIMUS allows and encourages marketing our services to potential government clients before the release of a Request for Proposal (RFP). This may be through marketing plans, telephone call plans, and face-to-face meetings.

- These plans must follow certain laws and regulations when marketing to government agencies.
- Certain marketing activities can only take place at specific points in the procurement process.
- Procurement integrity laws include rules against getting and giving procurement information or discussing private sector employment with government employees or officials.
- Client contacts may be limited or prohibited after the release of an RFP; contact the U.S. Corporate General Counsel or Compliance Officer to learn more about this.

## **Requests for Proposals (RFPs)**

We may be prohibited from preparing an RFP that we intend to bid. Make sure you understand the rules. After an RFP is released, we will not seek meetings with government officials other than those named in the RFP.

## **Marketing Materials and Proposals**

All MAXIMUS marketing materials and proposals must describe the Company's capabilities accurately and honestly. We will not include inaccurate, misleading or exaggerated claims about our performance, capabilities, products or services.

We will not make untrue statements or negative comments about our competitors or their services in our marketing materials and proposals.

All proposals must be accurate and realistic about performance, cost and schedule.

All resumes we include in a proposal must be accurate and complete about education, experience and capabilities. Employees who knowingly give false personal credentials are subject to disciplinary action up to and including end of employment.

## **Bribes and Kickbacks**

MAXIMUS employees will not offer or give bribes, kickbacks or other illegal rewards. This includes hiring relatives of any person or organization to attract or keep business. See Standard 7 for limitations for international activities.

### **Commissions and Other Payments**

MAXIMUS will not pay prohibited commissions, percentages, brokerages or other fees in return for getting a government or non-government contract. When we hire sales agents, they must not use improper influence to solicit or get business for MAXIMUS.

### **Procurement**

MAXIMUS will buy materials, supplies, equipment and services from qualified, competent and responsible sources. Whenever practical, we will make purchases based on competitive price, quality and service.

We will avoid conflicts and the appearance of favoritism. Employees must not make purchasing decisions based on gifts or family or personal relationships, or accept a kickback or any other reward for doing business with a vendor.

## Standard 4

### **Employment Practices**

Fair employment practices keep MAXIMUS compliant with labor and employment laws.

We obey all laws about freedom of association, privacy, collective bargaining, immigration, working time, wages and hours.

We obey laws against employment discrimination. MAXIMUS gives equal employment opportunities to all employees and applicants without regard to race, ethnic background, religion, gender, national origin, age, disability, sexual orientation or other legally protected characteristic.

We base our employment decisions on job qualifications and merit.

### **Conflicts of Interest**

MAXIMUS employees who recruit and hire must realize that government, former government and some private sector employees may have restrictions after they are hired. The U.S. Corporate General Counsel must review and approve any employment offer to a current or former government official. To learn more, talk to your local human capital, human resources or legal department.

MAXIMUS does not offer employment to current or former government officials in order to gain favor or unfair competitive advantage.

We are also cautious when there could be a potential conflict of interest, such as when hiring relatives or close associates of any government employees or officials whose decision-making authority could affect our business.

The U.S. Corporate General Counsel must review any employment offer to a relative or close associate of such a candidate.

A MAXIMUS Segment President must approve the hiring in advance.

### **Personal Relationships**

MAXIMUS respects the privacy rights of our employees. We respect their right to have consensual personal and professional relationships with each other. However, there is a strong potential conflict of interest when a supervisor or manager and a subordinate employee have a consensual personal relationship. There is the potential for improper influence over the subordinate employee's position, job responsibilities, performance evaluation or compensation.

Employees involved in consensual personal relationships must avoid any actions or situations that might weaken the public's confidence in MAXIMUS or damage the Company's or their own reputation for integrity.

You must tell your immediate supervisors and local human capital or human resources department about such relationships.

MAXIMUS employees should not have personal relationships with the persons we serve in our projects. If you have or develop a personal or family relationship with a client, you must tell your supervisor immediately. We will transfer the case to another employee. Failure to report this relationship could result in discipline, including ending employment and legal action.

MAXIMUS will consider hiring relatives of current employees. You must tell the local human capital or human resources department about employment offers for relatives of current employees. The offer must be approved in advance. No employee may be the immediate supervisor of a relative unless approved by the Chief Executive Officer or his representative.

## Standard 5

### **Workplace Conduct**

MAXIMUS employees must behave professionally at all times at work. Public areas in MAXIMUS facilities may have security monitors.

### **Fair and Safe Workplace**

MAXIMUS is committed to giving our employees a work environment free of discrimination, harassment, threats and violence. We will not tolerate actions, words, jokes or comments based on any legally protected characteristic, such as race, religion, disability, sexual orientation or gender.

Employees who exhibit discriminatory, harassing, threatening or violent conduct will be disciplined or fired. They may also be referred to law enforcement authorities for prosecution.

Sexual harassment, either obvious or subtle, is misconduct that is demeaning to another person. It undermines the integrity of the employment relationship. Sexual harassment is strictly prohibited.

Sexual harassment includes:

- Offensive comments, jokes, innuendo and sexually oriented remarks
- Unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual or otherwise offensive nature when:
  - » Submission to such conduct is made either explicitly or implicitly a term or condition of employment
  - » Submission to or rejection of such conduct by a person is used as a basis for employment decisions affecting that person
  - » Such conduct has the purpose or effect of unreasonably interfering with a person's work performance or creating an intimidating, hostile or offensive working environment

## **Reporting and Non-retaliation**

Employees must promptly report to their immediate supervisor any acts of discrimination, harassment, threats or violence. The supervisor will take appropriate action, including reporting the incident to the local human capital or human resources department.

If you are uncomfortable reporting the incident to your immediate supervisor, you may contact your local human capital or human resources department or call our confidential MAXIMUS Ethics Hotline at **1.844.592.2218**.

MAXIMUS does not tolerate retaliation against an employee who has reported harassment or discrimination in good faith.

## **Drug-free Workplace**

MAXIMUS has a drug-free workplace. Employees may not use, possess, distribute, sell, or be under the influence of illegal drugs while on MAXIMUS premises or while conducting MAXIMUS business off premises.

The legal use of prescribed drugs is permitted on the job only if it does not impair an employee's ability to perform the job effectively and safely and does not put others in the workplace in danger.

## **Alcohol Policy**

Responsible drinking of alcohol is only permitted at appropriate business functions.\* It must not impair an employee's performance or judgment.

## **Social Media**

Improper use of social media can pose risks to MAXIMUS confidential and proprietary information. It can also harm our reputation and brand, and jeopardize Company compliance with business rules, laws and SEC disclosure policies.

### ***Business Use of Social Media***

MAXIMUS employees are prohibited from representing, or speaking on behalf of MAXIMUS in social media forums, unless authorized by the U.S. Office of Corporate Communications and Investor Relations.

*\*Except where prohibited by local law (such as the Kingdom of Saudi Arabia).*

### ***Personal Use of Social Media***

Employees are personally responsible for what they communicate by social media. The public can read any posted social media. The public includes clients, supervisors, management, and investors. MAXIMUS employees may not make maliciously false statements about the Company, co-workers, clients, competitors, business interests and use of the MAXIMUS name.

Employees are encouraged to report maliciously false social media content or content that is disparaging or defamatory to clients or competitors. Reports can be made to supervisors, the local human capital or human resources department or the Ethics Hotline.

### **Property and Technology**

Employees must properly use and protect MAXIMUS property, technology and trade secrets. You must have proper permission to use MAXIMUS property and services for your personal benefit. You may not use Company resources for personal financial gain.

MAXIMUS may monitor telephones, computers, e-mail, voicemail, networks and communication systems, including the Internet, to make sure they are being used appropriately.

You may not:

- Use these items to send or receive unlawful information or information that would violate MAXIMUS policies
- Share or use confidential passwords, access codes or log-ins
- Illegally copy or use or install unauthorized software on MAXIMUS computers or networks

Government agencies sometimes deliver their property to MAXIMUS for use on a specific contract. All such property must be properly accounted for from the time of receipt to the time it is returned to the government or disposed of as directed by the government. MAXIMUS employees must treat such property with the same care as Company property.



## Standard 6

### **Protecting Confidential and Proprietary Information**

MAXIMUS directors, officers, employees or consultants may have access to confidential or proprietary information.

This includes:

- Technical/management and pricing information in MAXIMUS proposals
- Merger and acquisition information
- Business plans
- Financial and earnings reports
- Personal data of employees or participants of government programs

### **Confidential or Proprietary Information**

MAXIMUS employees must not use, tell or post proprietary or confidential information, unless authorized. You must not represent yourself as speaking on the Company's behalf in response to any messages about MAXIMUS or our business on any social networking or internet forum.

You must take necessary steps to prevent the loss of such information.

You must follow these same confidentiality standards after leaving MAXIMUS employment. MAXIMUS will take all available legal steps to protect its confidential or proprietary information.

### **Legal Matters**

MAXIMUS employees may not discuss outside MAXIMUS our position, strategy, or any communication or advice from attorneys about litigation or other sensitive legal matters, especially with someone who may have ties to an adverse party.

If anyone outside the Company contacts you for a statement on the Company's behalf regarding legal matters, you must contact the MAXIMUS General Counsel immediately. Legal discussions within MAXIMUS will occur on a "need to know" basis.

### **Copyrighted Materials**

MAXIMUS employees must not make unauthorized copies of copyrighted materials. This includes written materials, software, music and videos. You must not download or distribute copyrighted materials, such as music and video files, without proper authorization.

Violations of this policy could result in legal liability for us and possible civil and criminal charges. MAXIMUS monitors Internet and e-mail usage to ensure compliance with Company policies and related laws.

### **Personal Data**

Many countries have strict rules about the collection and use of personal data. Personal data may include, but is not limited to:

- Name
- Home address
- Office contact information
- Identification number
- Health or financial information

MAXIMUS employees must handle personal data responsibly and for legitimate business purposes only. You must obey privacy laws. You must immediately report suspected violations of the handling of personal data to a supervisor, business manager, Privacy Official or General Counsel.

### Standard 7

#### **Complying with Anti-corruption Laws**

##### **Anti-corruption**

Sales in new markets often involve sales representation issues, agent agreements, and business organization, taxation and local employment rules. You must address these issues in the earliest stage of marketing.

The United States Government restricts certain international activities. Laws such as the Foreign Corrupt Practices Act (FCPA), Export Control Statutes, Export Administration Regulations, and Anti-Boycott Act address these issues:

- Gifts and gratuities to government employees
- Marketing conduct
- Reporting of requests for certain information
- Exchanging information and technology outside the United States

These laws prohibit offering or giving improper payments, directly or indirectly, to public officials to influence official acts or decisions or to attract or keep business.

Anti-corruption laws of other countries, such as the UK Bribery Act, may also apply. Anyone handling our business in other countries must follow the rules, regulations, customs, manners and values of those countries. MAXIMUS is committed to obeying the laws of the countries where we do business.

There are penalties for breaking these laws. Penalties can include heavy fines and other sanctions for employees and for MAXIMUS. They may also include prison sentences and debarment. MAXIMUS will obey these laws in all of its actions and marketing activities, including those listed in Standard 3 (Proper Marketing and Procurement Practices).

All MAXIMUS employees engaged in business pursuits:

- Must not offer or give improper payments, either directly or through another party, to any government official for the purpose of influencing an official act or decision
- Must get related country-specific export licenses when required
- Must not engage in or support blacklisting of any person, group or country in violation of any applicable anti-boycott laws

## Standard 8

### **Gifts and Entertainment**

MAXIMUS directors, officers, employees and representatives shall not offer or accept gifts, gratuities or entertainment that would have the appearance or effect of improperly influencing the judgment of the receiver in the performance of duties.

Before giving a gift, entertaining a client or reimbursing client travel expenses, make sure you understand the legal requirements, the client's rules and MAXIMUS corporate and business guidelines. You must make sure records of such expenses accurately reflect the true nature of the transaction.

Some businesses offer gifts, particularly meals and entertainment (such as attendance at shows and sporting events), to those with whom they do or wish to do business. MAXIMUS employees may accept such offers only when the fair market value of the gift offered is not more than the equivalent of \$50.00 (USD). Ask your regional Compliance Officer immediately if you are not sure whether it is appropriate to accept such an offer.

MAXIMUS recognizes that it may sometimes be appropriate to offer or accept gifts, gratuities, or entertainment. Such situations include:

- Gifts, representing friendship, that are valued not more than the equivalent of \$50.00 (USD) that occur occasionally and infrequently when gifts are traditionally exchanged, such as birthdays, marriage, retirement, holidays or special occasions
- Reasonable entertainment at luncheon, dinner or business meetings with present or prospective customers or clients when the expenditure would be properly chargeable as a business expense
- Unsolicited advertising and promotional material (e.g., pens, calendars, coffee mugs, etc.) of a nominal value
- Awards given by charitable, educational, civil or religious organizations for meritorious contributions or service
- Gifts clearly motivated by personal friendship

Special rules on accepting gifts from outside sources apply to government officials and employees. Do not offer gifts, gratuities and entertainment to these persons unless expressly permitted by law. You must first get recommended approval from Operations Level 2 and Government Relations, and approval from the MAXIMUS U.S. Compliance Officer.

Gifts, gratuities and entertainment for government officials may be subject not only to gift acceptance rules of their own agency or country, but also to anti-corruption laws.

MAXIMUS employees must require any person or company who represents MAXIMUS, such as a consultant, agent, sales representative or contractor, to comply with this standard. When choosing persons or companies to represent MAXIMUS, you must follow all necessary due diligence procedures.

For additional information, please refer to the MAXIMUS Gift and Entertainment Policy or contact the U.S. Compliance Officer.

## Standard 9

### **Political Activities and Charitable Contributions**

We encourage you to participate in the political process on your own time and cost. You may not contribute or use MAXIMUS funds, services, facilities or other assets to support or oppose any political party or candidate for political office without first getting recommended approval from Operations Level 2 and Corporate Social Responsibility as well as approval from the Chief Executive Officer.

We also encourage you to participate in charitable activities at your own expense. You may do so during working time only with the permission of your local managing director.

You may not contribute or use MAXIMUS funds, services, facilities or other assets to support any charitable organization or event which is supported by, recommended by, or affiliated with a MAXIMUS client or any MAXIMUS employee without first getting recommended approval from Operations Level 2 and Corporate Social Responsibility as well as approval from the Chief Executive Officer.

We also offer you the opportunity to contribute voluntarily to the MAXIMUS Foundation.

## Standard 10

### **Insider Trading**

MAXIMUS stock is publicly traded on the New York Stock Exchange. We must obey the rules of the Securities and Exchange Commission that prohibit insider trading. Insider trading is when someone uses non-public, material information which might affect an investor's investment decision to buy, sell, or hold stock or other securities.

Examples of "inside information" include:

- Actual or forecasted financial results
- Earnings estimates
- Changes in earnings estimates
- Significant changes in the levels of operation
- Major contract awards or terminations
- Potential acquisitions
- Pending and threatened litigation
- Reorganizations
- Marketing strategies

Information stops being “inside” when it has been given to the public, through a press release or earnings report, and enough time has elapsed to allow the market to absorb and evaluate the information.

MAXIMUS employees or members of their immediate families who get access to inside information may not use that information to buy or sell MAXIMUS stock or options (including put and call options) or the securities of any other company, or give such information to others.

MAXIMUS directors and certain officers also have black-out periods when they may not trade in MAXIMUS securities. These black-out periods usually begin two weeks before the end of a quarter and end the day after we have announced our quarterly financial results. If you have any questions or concerns that you may be in an insider position, contact the U.S. General Counsel before entering into any transactions.

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## Section 5

### Key Contacts

MAXIMUS operates in complex and highly regulated industries. Sometimes the best course of action in a situation is not obvious. MAXIMUS offers many ways for employees or consultants to ask questions discuss issues or report concerns.

When in doubt, you can always contact the Corporate Compliance Officer. Please refer to the United States section of the International Contact Information at the end of this document for the Corporate Compliance Officer’s contact information. The Compliance Officer will handle your question or forward it to the right person.

Here are the key contacts:

#### **Manager/Direct Supervisor**

This is your best contact for workplace issues.

#### **Ethics Hotline (USA)**

1.844.592.2218 (Available 24 hours a day, 7 days a week)

Use this contact for advice and help interpreting these standards and Compliance Program Policies and Procedures or to anonymously report suspected violations of the standards, Company policies, or related laws and regulations.

#### **Audit Committee Hotline**

1.844.592.2218

[auditcommittee@maximus.com](mailto:auditcommittee@maximus.com)

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Use this contact to report complaints or issues to the Audit Committee of the Board of Directors relating to MAXIMUS accounting, auditing, financial reporting or internal controls.

**Corporate Communications (Social Media)**

[corporatecommunications@maximus.com](mailto:corporatecommunications@maximus.com)

Use this contact for questions about social media.

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**Acknowledgement**

All MAXIMUS employees must certify that they have read, understand and will comply with these Standards of Business Conduct and Ethics. Employees will certify online. Each employee must re-certify yearly.

## International Contact Information

### Australia

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**COMPLIANCE:**

1 800 229 713 or 0403 057 512  
[probity@maxsolutions.com.au](mailto:probity@maxsolutions.com.au)

**HUMAN RESOURCES:**

07 3727 1450 or 0427 987 325  
[hrm@maxsolutions.com.au](mailto:hrm@maxsolutions.com.au)

**LEGAL:**

07 3727 1356 or 0414 557 576  
[legal.legal@maxsolutions.com.au](mailto:legal.legal@maxsolutions.com.au)  
 1.800.629.4687\*  
 703.251.8602

**PRIVACY:**

[privacy@maxsolutions.com.au](mailto:privacy@maxsolutions.com.au)

### Canada

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**COMPLIANCE:**

Health Services  
 250.405.3776  
[mark.brennan@maximuscanada.ca](mailto:mark.brennan@maximuscanada.ca)

**Human Services**

604.678.5693  
[elaine.bourgeois@themis.bc.ca](mailto:elaine.bourgeois@themis.bc.ca)

**HUMAN RESOURCES:**

Health Services  
 250.405.3703  
[humanresources@maximuscanada.ca](mailto:humanresources@maximuscanada.ca)

**Human Services**

604.678.5693

**LEGAL:**

Health Services  
 1.800.629.4687\*  
 703.251.8602

**Human Services**

1.800.629.4687\*  
 250.220.4031  
[hannah.roots@themis.bc.ca](mailto:hannah.roots@themis.bc.ca)

**PRIVACY:**

Health Services  
 250.405.3726  
[bev.hooper@maximuscanada.ca](mailto:bev.hooper@maximuscanada.ca)

**Human Services**

250.220.4031  
[hannah.roots@themis.bc.ca](mailto:hannah.roots@themis.bc.ca)

### United States

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**COMPLIANCE:**

1.800.629.4687\*  
 703.251.8481  
[complianceofficer@maximus.com](mailto:complianceofficer@maximus.com)

**HUMAN RESOURCES:**

1.866.823.6664  
[hcrc@maximus.com](mailto:hcrc@maximus.com)

**LEGAL:**

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**Compliance Officer**

*Interpreting these standards and Compliance Program Policies and Procedures, Company policies, or related laws and regulation; reporting responsibilities; ethics and integrity training needs; reporting suspected violations of the standards, Compliance Program Policies, Company policies, or related laws and regulations (You may also report anonymously using the Ethics Hotline.)*

**Human Capital/Human Resources**

*Compensation and employment concerns; employment policy guidance and interpretation*

**Legal Department/General Counsel**

*Legal questions and guidance*

**Privacy Official**

*Questions about collecting, handling, and distributing personal information*

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\* main U.S. switchboard