



Standards for
**Business Conduct
and Ethics**

MAXIMUS[®]

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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 Maximus 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 officers, directors, employees, and consultants (“Maximus personnel”) 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.

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*[®]. We have a reputation for ethical behavior and high-quality services to clients. We require all Maximus personnel 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 or consultants 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 officer, director, employee, or consultant, 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 resources department
- U.S. Corporate Compliance Officer
- U.S. Corporate General Counsel
- U.S. Corporate Audit Committee

Report to Maximus Ethics Hotline here: [maximus.ethicspoint.com](https://www.maximus.ethicspoint.com). Or call:

- U.S. and Canada: **844.592.2218**
- Australia: **1.800.319.521**
- Italy: **800146986**
- Saudi Arabia: dial **1-800-10**, dial **844.592.2218** at the English prompt
- Singapore: ITFS hotline, **800.110.2311**
- Sweden: file online [maximus.ethicspoint.com](https://www.maximus.ethicspoint.com)
- U.K.: **0808.234.6400**

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 chiefcomplianceofficer@maximus.com.

Confidentiality of reporting

Maximus takes investigations very seriously and will try to maintain confidentiality to the greatest extent possible consistent with our obligation to investigate and remedy any matters.

We prohibit retribution or retaliation against anyone who reports suspected unethical behavior in good faith.

Maximus personnel who deliberately make a false accusation in order to harm or retaliate against another individual will be subject to disciplinary action, including ending employment.

Section 2

Basic Principles of Ethical Conduct

All Maximus personnel 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 our high 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 loyalty, 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.

Section 3

Compliance and Ethics Program

The Maximus Compliance and Ethics Program outlines our high 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, 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 annual training programs to make sure all Maximus personnel 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 Maximus personnel to report good-faith concerns about actual or suspected noncompliance 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 Maximus personnel deliberately make a false accusation. Disciplinary action can include ending employment.

5. Internal monitoring and auditing

- We monitor and audit 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 Maximus personnel 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 Maximus personnel
- 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 any Maximus personnel 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.

Section 4 Standards of Business Conduct and Ethics

Standard 1

Compliance with Laws and Regulations

All Maximus personnel 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.

View our [Compliance Program Policies and Procedures Manual](#) (internal access only)

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 personnel 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.

The Company complies with applicable mandatory reporting (including to the cognizant Office of Inspector General where required) and “full cooperation” obligations to the U.S. Government under the Federal Acquisition Regulations (FAR).

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 performed, and the Company will only charge the U.S. Government and other governmental or commercial customers for work the vendors actually performed. We bill our customers accurately and honestly for our work. Any Maximus personnel found mischarging time is subject to disciplinary action up to and including termination of employment.

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. It is your responsibility to record all data accurately and to ensure no false or misleading entries.

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. Maximus provides honest, clear, and accurate billing and pricing to our customers.

Organizational Conflicts of Interest

Maximus identifies, and avoids or mitigates, Organizational Conflicts of Interest (OCI) by screening new business opportunities appropriately. We comply with OCI restrictions.

Government Information

Government information will not be solicited or accepted from any source, directly or indirectly, if there is reason to believe its release is unauthorized or if its transmission or receipt would be unlawful. Pursuant to applicable laws and regulations, strict restrictions are imposed on the acceptance, protection, and control of classified government documents (confidential, secret, or top secret) or procurement-related materials. A breach of security must be immediately reported to the Maximus Legal Department or Compliance Officer.

View our [Privacy and Security Sanctions Policy](#) (internal access only)

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. Teaming agreements should be reviewed by the Contracts organization.

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. We will not enter into agreements not to solicit employees of our competitors unless legally permitted for legitimate business collaboration.

- **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 personnel 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. Seek guidance from the Legal Department if you think you have obtained confidential information that you should not have.

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.

- We 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. See Standard 2 regarding Organizational Conflicts of Interest. 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. Maximus personnel who knowingly give false personal credentials are subject to disciplinary action up to and including termination of employment.

Bribes and Kickbacks

Maximus personnel will not offer or give bribes, kickbacks, or other illegal rewards. A bribe or kickback may include giving or accepting gifts, gratuities, entertainment, or anything else of value provided in return for favorable treatment. 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 commercial contract. When we hire sales agents, they must not use improper influence to solicit or get business for Maximus. Bonuses and other payments contingent on an award of one or more U.S. Government contracts are prohibited unless approved in advance in accordance with the Authority Matrix.

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. Maximus personnel must not make purchasing decisions based on gifts, or family or personal relationships, solicit or accept a kickback, or any other reward for doing business with a vendor.

View our [Procurement Policy](#) (internal access only)

Standard 4

Employment Practices

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

We comply with all labor and employment laws, including laws concerning 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 personnel who recruit and hire must be aware 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 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.

You should not discuss or transact business with organizations in which you, or your friends and family, have a financial interest without the prior approval of the Compliance Officer. Business decisions should be based on the business needs and not personal interest.

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 in accordance with the Authority Matrix.

Personal Relationships

We respect the privacy rights of Maximus personnel. 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 have a consensual personal relationship. There is the potential for improper influence over the position, job responsibilities, performance evaluation, or compensation.

Maximus personnel 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 resources department about such relationships. Failure to report such a relationship could result in discipline, including ending employment and legal action.

Maximus personnel 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 project to another employee or consultant. Failure to report this relationship could result in discipline, including ending employment and legal action.

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

View our [Employee Handbook](#) (internal access only)

Standard 5

Workplace Conduct

Maximus personnel must always behave professionally at work. Public areas in Maximus facilities may have security monitors.

Fair and Safe Workplace

We are committed to giving Maximus personnel 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.

Maximus personnel 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, but is not limited to:

- Offensive pictures, 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

Maximus personnel 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 resources department.

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

Online: maximus.ethicspoint.com

Phone:

- U.S. and Canada: **844.592.2218**
- Australia: **1.800.319.521**
- Italy: **800146986**
- Saudi Arabia: dial **1-800-10**, dial **844.592.2218** at the English prompt
- Sweden: file online maximus.ethicspoint.com
- Singapore: ITFS hotline, **800.110.2311**
- U.K.: **0808.234.6400**

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. Maximus personnel 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 individual'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 (*except where prohibited by local law such as the Kingdom of Saudi Arabia*). It must not impair an individual'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 personnel 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.

Personal Use of Social Media

Maximus personnel 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 personnel are encouraged to report disparaging social media content or content that reflects poorly on Maximus or its stakeholders. Reports can be made to supervisors, the local human resources department or the Ethics Hotline.

Property and Technology

Maximus personnel 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 personnel are prohibited from using personal devices, apps, or other software that do not preserve records of the Company's business.

Maximus may monitor without prior notice telephones, computers, email, 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 inappropriate or unlawful information
- Share or use confidential passwords, access codes, or logins
- Illegally copy, 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 personnel must treat such property with the same care as Company property.

View our [Acceptable Use Policy](#) (internal access only)

View our [Information Security Governance Set](#) (internal access only)

Standard 6

Protecting Confidential and Proprietary Information

Maximus personnel 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 Maximus personnel or participants of government programs, including individuals that Maximus serves as a business associate or contractor.

Confidential or Proprietary Information

Maximus personnel must not use, share, disclose or post proprietary or confidential information, unless authorized in writing. You must not respond to any messages about the Company 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 or

otherwise ending your relationship with Maximus. Maximus will take all available legal steps to protect its confidential or proprietary information.

Legal Matters

Maximus personnel 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 about legal matters, you must contact the Maximus General Counsel immediately. Legal discussions within Maximus will occur on a “need to know” basis.

Copyrighted Materials

For Maximus’ protections as well as your own, it is critical that you show proper respect for the laws governing copyright, fair use of copyrighted material owned by others, trademarks, and other intellectual property, including Maximus’ own copyrights, trademarks, and brands. This includes written materials, software, music, and videos.

Violations of this policy could result in legal liability for us and possible civil and criminal charges. Maximus monitors internet and email 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 personnel 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.

Retention of Records

Maximus personnel must understand and comply with Maximus’ records retention policy.

Maximus personnel may not destroy paper or electronic documents that are subject to a litigation hold, or in response to or in anticipation of an investigation, audit or lawsuit, even if such documents are only copies of the originals.

The issue of document retention is important, and both Maximus and Maximus personnel can suffer serious consequences for failure to understand and comply with document retention policies. If you have any questions about whether it is proper to destroy any document or record in any form, be sure to contact the Maximus Legal Department or Compliance Officer.

View our [Records Management Policy](#) (internal access only)

Certain Permitted Communications

This Standard on confidential and proprietary information and the other provisions of this Code are not intended to preclude or dissuade Maximus personnel from engaging in communications or activities protected by state or federal law, such as:

Discussing wages, benefits, or other terms and conditions of employment, or otherwise restricting employees' rights under Section 7 of the National Labor Relations Act.

Making disclosures that are protected under the whistleblower provisions of state or federal law, such as providing confidential and proprietary information to, reporting violations of law or regulation to, filing a claim, or assisting with an investigation with, a government authority.

In addition, Maximus personnel may disclose confidential and proprietary information to a government official or to an attorney solely for the purpose of reporting or investigating a suspected violation of law or when pursuing certain retaliation claims, and use such information in certain court proceedings without fear of prosecution, liability, or retaliation, provided such disclosure is in compliance with the Defend Trade Secrets Act.

View our [Privacy and Security Sanctions Policy](#) (internal access only)

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 U.S. Government restricts certain international activities as well as interactions with U.S. and foreign government officials. 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 anything of value, directly or indirectly, to public officials, political parties, candidates, or individuals associated with state-owned commercial entities to influence official acts or decisions or to attract or keep business.

Anti-corruption laws of other countries, such as the UK Bribery Act and comparable laws in Australia, Canada, Singapore, Saudi Arabia, and other countries where Maximus does business, 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 Maximus personnel and for the Company. 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).

In alignment with the Maximus Global Bribery/Anti-Corruption Policy; All Maximus personnel 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

View our [Global Anti-Bribery/Anti-Corruption Policy](#) (internal access only)

Standard 8

Gifts and Entertainment

Maximus personnel 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 personnel 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 approval of the Maximus 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.

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

View our [Global Anti-Bribery/Anti-Corruption Policy](#) (internal access only)

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 written consent of the Chief Executive Officer.

We also encourage you to participate in charitable activities at your own expense. You may do so on Company 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 personnel without first getting written consent of the Chief Executive Officer.

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

View our [Global Anti-Bribery/Anti-Corruption Policy](#) (internal access only)

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 occurs when someone uses material non-public information to transact in a company's stock or other securities.

Examples of "material non-public 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 non-public 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 personnel 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.

View our [Insider Trading Policy](#) (internal access only)

Section 5

Key Contacts

Maximus operates in complex and highly regulated industries. Sometimes the best course of action in a situation is not obvious. We offer many ways for Maximus personnel 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)

Online: maximus.ethicspoint.com

Phone:

- U.S. and Canada: **844.592.2218**
- Australia: **1.800.319.521**
- Italy: **800146986**
- Saudi Arabia: dial **1-800-10**, dial **844.592.2218** at the English prompt
- Singapore: ITFS hotline, **800.110.2311**
- Sweden: file online maximus.ethicspoint.com
- U.K.: **0808.234.6400**

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

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

Use this contact for questions about social media.

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

COMPLIANCE:

1 800 229 713 or 0403 057 512
probity@maxsolutions.com.au

HUMAN RESOURCES:

07 3727 1307
hrbp@maxsolutions.com.au

LEGAL:

07 3727 1359 or 07 3727 1300
legal.legal@maxsolutions.com.au
 1.800.629.4687*
 703.251.8602*

PRIVACY:

privacy@maxsolutions.com.au

Canada

COMPLIANCE:

Health and Human Services
 250.405.3705
tracey.schmitz@maximuscanada.ca

HUMAN RESOURCES:

Health and Human Services
 250.405.3705
humanresources@maximuscanada.ca

LEGAL:

Health and Human Services
 250.405.3705
tracey.schmitz@maximuscanada.ca
 1.800.629.4687*
 703.251.8602

PRIVACY:

Health and Human Services
 250.405.3726
bev.hooper@maximuscanada.ca

Italy

COMPLIANCE:

dmarks@maximusuk.co.uk

HUMAN RESOURCES:

HRSolutions@maximusuk.co.uk

LEGAL:

1.800.629.4687*
 703.251.8602
dmarks@maximusuk.co.uk

PRIVACY:

dataprotection@maximusuk.co.uk

Sweden

COMPLIANCE:

dmarks@maximusuk.co.uk

HUMAN RESOURCES:

HRSolutions@maximusuk.co.uk

LEGAL:

1.800.629.4687*
 703.251.8602
dmarks@maximusuk.co.uk

PRIVACY:

dataprotection@maximusuk.co.uk

United States

COMPLIANCE:

1.800.629.4687*
 703.251.8481
chiefcomplianceofficer@maximus.com

HUMAN RESOURCES:

1.866.307.1477
hrsc@maximus.com

LEGAL:

1.800.629.4687*
 703.251.8602

PRIVACY:

privacyofficial@maximus.com

* main U.S. switchboard

United Kingdom

COMPLIANCE:

dmarks@maximusuk.co.uk

HUMAN RESOURCES:

HRsolutions@maximusuk.co.uk

LEGAL:

dmarks@maximusuk.co.uk

1.800.629.4687*

703.251.8602*

PRIVACY:

dataprotection@maximusuk.co.uk

Middle East Gulf Region

COMPLIANCE:

+966 114089521

mamulghairah@maximusgulf.com

HUMAN RESOURCES:

+966 114089503

hr@maximusgulf.com

LEGAL:

1.800.629.4687*

703.251.8602

PRIVACY:

+966 114089503

privacy@maximusgulf.com

Singapore

COMPLIANCE:

compliance@maximussingapore.sg

HUMAN RESOURCES:

hr@maximussingapore.sg

LEGAL:

1.800.629.4687*

703.251.8602

legal@maximussingapore.sg

PRIVACY:

dataprotectionofficer@maximussingapore.sg

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

* main U.S. switchboard