

maximus

Supplier Code of Conduct

**Transforming
Lives.**

Introduction

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 organisation and around the world, and across all disciplines, including procurement and subcontracting; compliance with laws and regulation; privacy and security; organisational and personal conflicts of interest; accounting, time-keeping, expense reporting, and billing; and equal opportunity and non-discrimination. Ethics at Maximus is more than simply following a particular rule or law; it is a shared commitment to hold to the highest standards of conduct.

These standards are based on a common-sense principle—do the right thing all the time. Maximus requires all of its suppliers, vendors, teaming partners, and subcontractors (“Suppliers”) to meet these same standards and to comply with this Supplier Code of Conduct.

Maximus is committed to:

- Partner only with Suppliers who comply with an ethical code of conduct.
- Exclude Suppliers who commit acts of misconduct.
- Improve social outcomes for those we serve.

About this guide

- Section 1 Gives basic information about the Maximus philosophy and explains our Company’s commitment to ethical conduct.
- Section 2 Lists the eight principles of professional ethical conduct that all Maximus Suppliers must follow.
- Section 3 Gives detailed information for each of the five Standards of the Supplier Code of Conduct
- Section 4 Lists resources and key contacts for reporting violations and getting guidance.

Section 1: Overview

Introduction

This Supplier Code of Conduct aligns with the Maximus standards for its business operations.

Maximus requires that all Suppliers implement the ethical principles set forth in are this Code of Conduct with respect to all goods, services, and deliverables the Suppliers provide to Maximus, its subsidiaries and affiliates. The Code will be incorporated by reference into all Maximus Supplier contracts and agreements.

Section 2: Principles of the Maximus supplier ethical conduct

Maximus requires its Suppliers to

1. maintain high standards of integrity and professionalism in their business dealings;
2. adhering to the laws of the countries where they operate, and;
3. take action to minimise negative impacts and risks to Maximus business operations, to Maximus customers and their operations, and to the general public.

Therefore, the principles of the Maximus Supplier Code of Conduct are to:

- Conduct business affairs honestly, fairly, and ethically;
- Follow all applicable laws, regulations, and contractual obligations when conducting business;
- Avoid any actions that may create the appearance of unethical or illegal behaviour;
- Maintain a high level of integrity and ethics in your interactions with one another, with your customers and clients, and with the general public;
- Maintain a safe workplace;
- Accept other Suppliers as valuable members of the Maximus team and treat them with loyalty, respect, and dignity;
- Extend fair employment practices to every member of your community;
- Avoid actual and perceived conflicts of interest in both company and personal affairs;
- Seek to provide Social Value outcomes when delivering services to Maximus

Section 3: Supplier Code of Conduct Standards

Standard 1: Compliance with Laws and Regulations

Maximus Suppliers must always follow all applicable laws and regulations. When a law or regulation is violated, there may be severe financial penalties or other sanctions for Maximus and the Suppliers and personnel involved.

You must promptly report any activity that appears to violate applicable laws and regulations, contract obligations, or Maximus policies and procedures.

To report a violation or violation or for assistance in assessing a possible violation, promptly contact your Maximus procurement point of contact.

Maximus Suppliers must ensure that, in the delivery of any services, neither it, nor any of its affiliates, embarrasses Maximus or its clients or otherwise brings Maximus into disrepute.

Standard 2: Employment Practices

Maximus Suppliers must comply with all labour and employment standards & laws, including laws concerning freedom of association, collective bargaining, immigration, working time, and wages and hour laws. Contracts of employment should be documented and be fair.

Additional work must be freely chosen, suppliers should ensure they can demonstrate compliance with Modern Slavery Act, and must support the prohibition and elimination of child labour in supply chains and comply with all applicable child labour laws.

Maximus in the UK holds the Real Living Wage employer mark and has been accredited by The Living Wage Foundation. This means we pay our staff over the age of 18 the hourly rates published here <https://www.livingwage.org.uk/> with annual uplifts implemented within six months. Crucially, this living wage agreement covers all 3rd party regularly contracted staff, working indirectly for Maximus such as cleaning, security or catering staff. All relevant new contracts will include a requirement to pay the Real Living Wage, those with existing contracts will need to develop a pathway to ensure by January 2023 all contracts move to Real Living Wage, with the support of Maximus. Wages should be paid in cash directly into the employees bank accounts unless mutually agree otherwise.

Maximus Suppliers must obey laws prohibiting employment discrimination and must provide 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 characteristics. Suppliers must not engage in or support blacklisting of any person, group or country in violation of any applicable anti-boycott laws.

Suppliers should provide training and development opportunities to help raise their employees' skills through training and access to professional development as befits their role.

Standard 3: Fair and Safe Workplace

Suppliers must implement appropriate health and safety policies and procedures overseen by an individual responsible for compliance and monitoring and ensure that employees have the necessary training and health and safety equipment. This includes providing comfortable and hygienic working conditions with clean facilities and water suitable for drinking and washing.

Suppliers must actively commit to eradicate discrimination in the work environment, hiring, compensation, training, promotion, termination or retirement either directly or indirectly, in accordance with the Equality Act. This also includes a work environment free of harassments, threats, sexual harassment and violence where employees and customers are treated with dignity and respect.

Employee health and wellbeing is instrumental to a safe working environment. Maximus Suppliers are encouraged to prioritise employee wellbeing by investing in measures to provide for a healthier employee and provide a better quality of life.

Suppliers must provide clear and accessible processes for resolving disputes with their employees and enabling their employees to file grievances in a confidential manner. Supplier grievance mechanisms should include assurance that the Supplier will not tolerate retaliation against an employee who has reported a grievance in good faith.

Standard 4: Protecting Confidential and Proprietary Information

Suppliers must obey privacy laws. Suppliers must respect privacy of individuals (whether a customer, client, or employee) and handle personal data appropriately and by the letter of the law, in the UK this includes complying with the GDPR and the DPA. Personal data may include, but is not limited to:

Name, Home address, Office contact information, National Insurance number, Health and/or financial information

Reporting breaches directly to Maximus is imperative. Maximus Suppliers must handle personal data responsibly and for legitimate business purposes only and must secure the data as required by applicable laws and regulation and the terms of the Supplier's agreements with Maximus. Suppliers must obey privacy laws. Suppliers must immediately report suspected violations of the handling of personal data per supplier's policy, and in accordance with their contractual obligations to Maximus.

Standard 5: Ethical Standards

Tax Compliance

Maximus will only work with Suppliers that are compliant with payment of appropriate taxes and who do not seek to evade tax or commit fraud.

Anti-Bribery & Corruption

All Suppliers should have an anti-bribery policy covering the risk that someone who works for you or on your behalf might be exposed to bribery. It is illegal to offer, promise, give, request, agree, receive, or accept bribes. Suppliers anti-bribery policy should be appropriate to the level of risk your business faces. Your policy should be made available to all staff and include:

- your approach to reducing and controlling the risks of bribery;
- rules about accepting gifts, hospitality or donations;
- guidance on how to conduct your business, e.g. negotiating contracts;

- rules on avoiding or stopping conflicts of interest.

Social Value

Maximus is committed to being a leader in social value and want to work with our Suppliers to be confident that together we establish the right commercial relationship that enables us to deliver real benefits - whether that is creating more apprenticeships, reducing carbon emissions, or positively impacting the lives of people in your local area, business, or your own unique local priorities.

Suppliers will help ensure that our approach will help leave a positive social, economic and environmental legacy by:

- Providing relevant social value benefits as part of any bid, tender or proposal submitted to Maximus.
- Adhering to any commitments in our contracts for social value delivery in practice
- Demonstrating a commitment to the environment and ensure that good environmental stewardship is in place.
- Sharing evidence of contributions towards the positive health and well-being of the people you interact with.
- Seeking feedback from staff, customers and stakeholders on your impacts
- Monitoring emerging policy and best practice in Social Value to ensure that a high standards of industry practices are maintained.

Section 4: Resources and key points of contact

Compliance

Each employee, consultant, contractor, and Supplier of Maximus is responsible for ensuring compliance with this Code of Conduct.

Reporting ethical violations

Suppliers must report any suspected ethical violations, or breach of this code of conduct related to Maximus. You may speak to your procurement team point of contact or report to Maximus Ethics Hotline here:

maximus.ethicspoint.com or call: U.K.: +44(0) 808-234-6400

If you are not sure where to send your report, email the Corporate Compliance Officer at chiefcomplianceofficer@maximus.com

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.

Maximus prohibits retribution or retaliation against anyone who reports suspected human rights violations in good faith and will take remedial or disciplinary action against anyone who violates related laws.

Suppliers will provide relevant and appropriate information and support to provide assurance regards compliance with this Code of Conduct.