



DECEMBER 2022

Code of Conduct

Standards of Business for
One Global Abt



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INTRODUCTION

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**BOLD
THINKERS
DRIVING
REAL-WORLD
IMPACT**



A Message from the President

Dear Abt Associates Colleagues:

“Whether we work to shape public policy or business decisions, we believe that our credible approach can make a difference to our clients, our community, the nation, and the world.” Abt Associates has lived and grown by these words of our founder, Clark Abt, for over 40 years.

At Abt, our mission is to improve the quality of life and economic well-being of people worldwide. The well-being of people includes our staff; this document is intended to help guide you in making decisions and doing the right thing. We pride ourselves on creating a safe, inclusive, and welcoming work environment and the Code of Conduct sets expectations for respectful, honest behavior.

Additionally, this document is about our reputation—a reputation built carefully over those years. Our reputation—for integrity, trustworthiness, and outstanding performance—is a valuable asset that is vital to the success of our company. Performing exceptional work while treating colleagues, clients, partners, and beneficiaries with integrity and respect cements our reputation as bold thinkers driving real-world impact.

Our Code of Conduct is a critical resource to help ensure that each of us knows how to do the right thing, every day. The code, however, is not a substitute for good judgment, and it cannot address every issue we may face. It is in these situations, where there is no clear guidance or answer, that our decisions need to be based on our mission, our values, consultation with experts, and our own good sense. Each of our decisions and actions shapes Abt Associates.

Whether you work in the United States, United Kingdom, Australia, or in one of our many site offices, and no matter your position, each of us is expected to conduct ourselves ethically and help our colleagues do the same. Leadership is here to help you succeed in these areas, and Abt Associates has multiple resources if you need help or would like to raise issues.

Living up to our high standards is not necessarily the easiest path, but by doing so we ensure that Abt Associates will always be recognized for both its excellent work and its unyielding integrity, and that each of us work for a company we can be proud of. Now more than ever, building a great company requires an unwavering commitment to the highest ethical standards. Each of us is accountable to do the right thing. Thank you for your commitment to be accountable for all you do, and for your contribution to Abt Associates’ excellent reputation.

A handwritten signature in black ink that reads "Kathleen L. Flanagan". The signature is fluid and cursive, written over a light gray background.

Kathleen L. Flanagan
President and CEO



ABT VALUES

As a company, we have committed to the following Abt values:

MISSION. I am driven by Abt's mission to improve the lives of people worldwide. I contribute directly to and positively affect our financial health to expand our mission and sustainable impact around the world.

EXCELLENCE. I approach my work with discipline and rigor while seeking opportunities for continuous improvement and development. I set high expectations for myself and others, and take responsibility to coach and teach others. I will be entrepreneurial and actively pursue innovation, and encourage others to do the same. I seek to achieve the best outcomes, to maintain Abt's reputation for excellence, even if the path is uncomfortable.

DIVERSITY. I value individuals of all races, ethnicities, religions, genders, sexes, sexual orientations and identities, ages, mental and physical abilities, and nationalities. I actively build a diverse Abt community that collaborates with and reflects those we serve. I empower and create opportunity so all voices are heard regardless of background and experiences.

RESPECT. I work to earn, build, and sustain trust. I treat people with respect regardless of their position or their agreement with me. I consider the impact that my words, actions, and decisions have on others.

INTEGRITY. I do the right thing, even when no one is looking. I am accountable for my choices and actions, and I honor my commitments. I seek to understand and learn from mistakes.

BALANCE. I can flex when I work, where I work, or how I work to meet both personal and professional commitments. I contribute to an environment where my colleagues can experience balance. I must balance all of Abt's stakeholders interests in my decision making.

Our Code of Conduct— Ethics for Everyone

At Abt Associates, we believe in “ethics for everyone.” This means that we expect every employee of the company to participate in creating an ethical atmosphere, one where people feel comfortable asking questions about ethical issues and reporting concerns. Consider this Code of Conduct your guide to working ethically and honestly in our highly regulated business environment. The code establishes a basic foundation for ethical behavior by communicating our philosophy and commitment to all of our employees, clients, customers, and other stakeholders, and to the communities in which we do business. You should use the code as a resource whenever ethical questions arise on the job as well as a resource for your everyday work, but never hesitate to reach out to the appropriate team with a question. The Code of Conduct is divided by Abt values and describes the standards and rules that apply to our work. In each area, we focus on some of the main issues that may arise and provide keys to compliance that will help you to act with integrity and in accordance with Abt values.

You should not hesitate to voice concerns or to ask questions about whether any conduct, either of yours or of your colleagues, may violate the code - your concerns or questions will be handled with the utmost confidentiality. You should be alert to possible

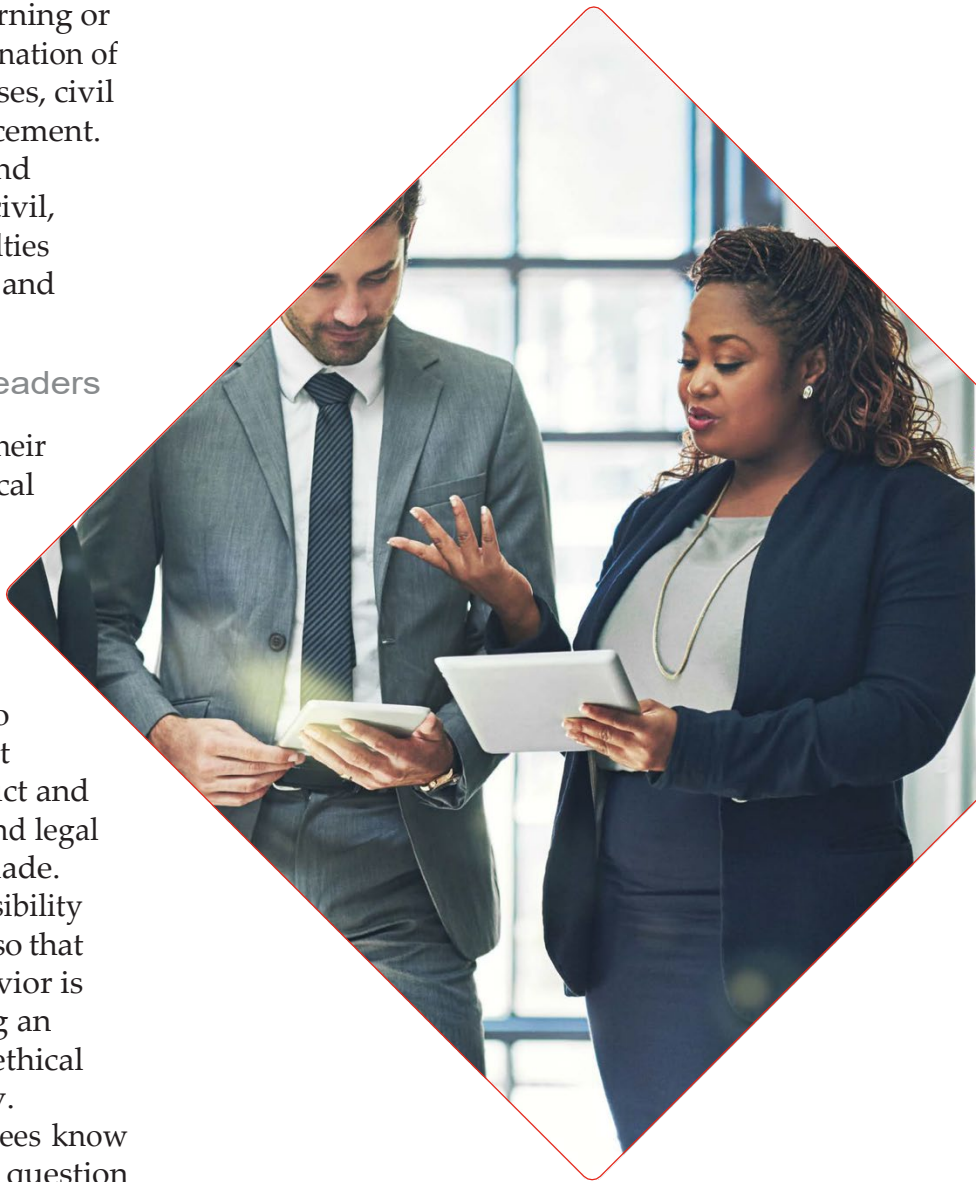
violations of the code by others, and report suspected violations to your supervisor, a member of your leadership team, or the Legal team promptly. If you are not comfortable reporting to your supervisor, you may report to the Legal team directly. Abt takes retaliation very seriously and prohibits retaliation of any type for reporting a concern. If you experience retaliation, you may report anonymously through the web-based helpline or to the Legal team directly. Please see “Abt’s Compliance Program” for information about how to reach out to the Legal team to ask a question or report a concern.

The Code of Conduct applies to all Abt employees (including advisors, consultants, contractors, and other temporary employees) and members of our Board of Directors (“directors”) worldwide (including all subsidiaries). Anyone representing Abt – including partners and subcontractors – must act in compliance with the Code. Additionally, anyone to whom the code applies may not use a contractor, agent, consultant, broker, or other third party to perform any act prohibited by law or by Abt Associates policy. If compliance with the Code of Conduct appears to conflict with local law, employees should contact the [General Counsel](#).

We expect all employees and directors to read, understand, and comply with our Code of Conduct. Any employee who violates the standards in the code, permits a subordinate to do so, or fails to promptly report a known violation may be subject to disciplinary action, which may range from a warning or reprimand up to and including termination of employment and, in appropriate cases, civil legal action or referral to law enforcement. Failure to comply with local laws and regulations may result in criminal, civil, contractual, and administrative penalties being assessed against the company and individual employees.

Additional Responsibilities of Leaders

Leaders and managers, by virtue of their positions of authority, must be ethical role models for all employees. Managers are expected to proactively develop in employees a sense of commitment to the spirit, as well as the letter, of the code. Managers are role models who are expected to exemplify the highest standards of ethical business conduct and encourage discussion of the ethical and legal implications of decisions that are made. Managers have an additional responsibility to set an appropriate tone at the top so that employees know what ethical behavior is expected of them as well as creating an environment where discussions of ethical dilemmas are held often and openly. Managers should make sure employees know their doors are always open to ask a question or report a concern and employees will not be penalized for doing so.





MISSION

Working Ethically with Clients

Our accomplishments on our clients' behalf are a source of satisfaction and pride for both our clients and ourselves. We work hard to represent our clients' interests, to understand their expectations, to respond effectively to their needs, and to earn their loyalty. Interactions with our clients require the highest standards of professional excellence and ethical behavior. Our day-to-day interactions with clients turn these commitments to honest and ethical behavior into reality.

Working ethically with our clients means competing fairly, complying with relevant laws and regulations, and billing clients properly. It also means delivering accurate and impartial work, regardless of whether results differ from client expectations. If you ever feel pressure from a client to deliver results that are not accurate or impartial, please report this immediately.

Ethics Internationally

Working globally can raise additional ethical issues that must be addressed clearly by Abt Associates at all levels. Local business and cultural practices vary, and standard practice in some countries where we work may conflict with our policies and Code of Conduct. If you find yourself in a situation where following the Code of Conduct would go against a local custom or harm an important relationship, reach out for help. All Abt Associates employees must remain committed to abiding by the business conduct principles described in this code. In short, your ethics philosophy must remain constant, no matter where you are working.

For one example, IRBs are required to adhere to local ethical norms and regulatory

requirements and may supersede U.S. requirements if they are more protective or conservative.

Competing Fairly

We must never use any illegal or unethical means to get information about other companies. Legitimate sources of competitive information include publicly available information such as news accounts, industry surveys, competitors' displays at conferences and trade shows, and information publicly available on the internet. You may gain competitive information appropriately from customers and suppliers (unless they are prohibited from sharing the information).

Sometimes we partner on a proposal or project with companies against which we compete for another project. It is particularly important to ensure that we do not improperly use such partners' cost and pricing information when we are competing against them in a proposal effort.

Our clients have rules and regulations to ensure that their contracts are awarded fairly and do not give one contractor an undue advantage over any others. All Abt Associates employees are prohibited from:

- Receiving a competitor's bid or proposal information (or other confidential information) from any unauthorized source, including government personnel, disgruntled employees, or consultants, prior to award of the related contract.
- Having undisclosed employment discussions with a government employee who is engaged personally and substantially in the procurement process.
- Compensating a former government employee who had served as a procurement official for information.

Balancing Stakeholder Interests

Abt works with a variety of diverse stakeholders: partners, clients, beneficiaries, and employees. Before making important business decisions, be sure to consider and, where appropriate, solicit input about how the decision will impact Abt's stakeholders. Be honest in discussing risks and benefits with stakeholders and make decisions that are in the best interests of both the company and stakeholders.

KEYS TO COMPLIANCE: MISSION

- Act with ethics and compliance in mind so staff can focus on programs and our mission
- Value and respect cultures from communities in which we work
- Work to represent Abt and our clients in an honest, ethical way
- Never compromise a project's results or ethics based on client expectations
- Consider stakeholder priorities and interests when making important decisions
- Do the right thing, no matter the situation





EXCELLENCE

Ensuring Accuracy, Impartiality, and Scientific Integrity

Abt Associates is renowned for the accuracy, impartiality, and quality of our work. Our strong reputation depends on it. When working with clients at any stage—from writing a proposal to working on a project to delivering the results—you must seek to deliver high quality results that maintain the highest principles of scientific integrity. All information that you present to a client must be accurate and complete and all advice offered must be objective and independent without conflicts of interest or undue influence from clients or others. Our advice must be based on careful consideration that weighs available inputs and data. We must all interact fairly, honestly, and respectfully with all stakeholder groups involved in our work.

We ensure that all of our technical work meets or exceeds the highest quality standards via our quality assurance system, which requires that each project has a Project Quality Reviewer and a Project Quality Assurance Plan.

Protection of Human Research Participants

We must conduct research in a manner that protects and safeguards the rights and welfare of participants and is in accordance with applicable international, federal, state, and local regulations. To accomplish this, Abt Associates has an Institutional Review Board (IRB) responsible for overseeing our research in accordance with applicable requirements. Prior to beginning or making changes to a human research study, Abt staff must submit the study protocol to the IRB for prospective review and approval or exemption, if eligible.

Being a Good Abt Citizen

Excellence does not only refer to technical excellence. Abt expects all staff to be excellent Abt citizens, which means not just doing your technical work well but adhering to policies and procedures and learning, innovating, and sharing your knowledge so everyone can benefit. You should live Abt's values by being Abt ambassadors, aligning your behaviors and actions to our value statements, and providing constructive and solution-oriented input. Being an Abt Ambassador includes such diverse actions as adopting an equity lens in undertaking our work, adapting to change by being open and assuming positive intent, and creating a culture of emotional safety for your team members.

KEYS TO COMPLIANCE: EXCELLENCE

- Strive for quality, accuracy, inclusion, and impartiality
- Always offer the best possible guidance to your clients based on your expertise, experience, and research
- Follow the requirements of our IRB, Research Misconduct, and Project Quality Assurance Policies
- Be cognizant of the ways you can be a good citizen that don't involve technical work
- Create an atmosphere that lets your colleagues be good Abt citizens as well
- Collaborate, volunteer, and seek diverse perspectives



DIVERSITY

Equity, Diversity, Inclusion, and Accessibility

Equity, diversity, inclusion, and accessibility (EDIA) are at the forefront at Abt Associates, Inc. We celebrate and thrive on different perspectives, cultures, expertise, and points of view. It's our commitment to each other, whether in Uganda or the United States, Papua New Guinea or Colombia, Egypt, or Australia. EDIA is central to our mission to improve the quality of life and economic well-being of people worldwide. By actively discussing, learning about, and applying skills around EDIA, we can become stronger as an organization for our colleagues and clients and our client's clients.

Inclusivity is a staple of our work environment. It's how more than 3,600 people, speaking 56 languages, across 60 countries, are able to collaborate to achieve our mission. We are dedicated to equity across race, ethnicity, color, religion, gender, sex, sexual orientation, marital status, national origin, citizenship status, age, physical or mental ability, veteran status, or any other underrepresented group or personal characteristic. These aren't just policies—it is how we live the values we promote by working alongside our beneficiaries to move communities to security worldwide.

EDIA is intentional actions that educate and equip us to ensure that each of us can bring our whole selves to work and contribute ideas that support Abt's mission, project work, and people and culture goals.

Expectations for staff

EDIA is everyone's responsibility, and understanding our own identities, biases, and how they show up in the workplace is a critical first step on our journey as an organization. You should take offered trainings, participate in learning opportunities, and dedicate time to understand the identities and experiences of your fellow Abt colleagues.

Staff should also participate in equity programming - providing people with tailored support to achieve the best possible life outcomes through partnering with the people most impacted as decision makers to ensure that the systems governing their lives meet their needs in terms of access, rights, opportunities, and outcomes. Whether you are designing, implementing, or supporting a project or initiative, equity should be at the front of your mind, grounded in local culture, and practically applied.

KEYS TO COMPLIANCE: DIVERSITY

- Educate yourself on identities other than your own
- Work to understand your own biases and how they might show up in your work
- Participate in training and information sessions about EDI
- Ensure EDI is built into design, research, programming and operational policy and delivery.



RESPECT

Human Rights

The abuse of human rights goes against Abt's values and mission. Abt has adopted the principles established by the Universal Declaration on Human Rights and expects staff to conduct all projects in accordance with these principles.

Keeping People Safe

We are dedicated to safeguarding the communities with whom we work as well as our staff and others working in the organization.

We ensure our workplace environment is free from harassment or behavior of any kind that is not conducive to a productive, pleasant work environment. We will not tolerate violent acts or expressions of violent intent toward management, employees, customers, vendors, any other persons, or property. Every statement, act, or expression will be considered serious and handled accordingly.

Harassment of an employee by a coworker, customer, vendor, or anyone associated with Abt Associates can take many forms. It can be physical, verbal, or written, and it may or may not be sexual in nature. For a more complete list of examples of harassment, please see Abt's Freedom from Harassment policy.

We are also committed to ensuring that our activities do not put children or communities at risk of harm and abuse. We work to ensure our staff and Personnel do not engage in sexual exploitation and abuse of communities.

Sexual abuse is any actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. It includes, but is not limited to, sexual assault such as non-consensual kissing and touching, all forms of rape, for example attempts to force someone to perform oral sex, or any other forced sex act. All sexual activity with someone who is unable to consent, either due to age or mental capacity, is considered to be sexual abuse.

Sexual exploitation is any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, threatening or profiting monetarily, socially, or politically from the sexual exploitation of another.

It is important to Abt that everyone including the most vulnerable or at risk members of a population be treated with respect and dignity.

We also have a legal and ethical obligation not to traffic in persons or engage in any of the activities related to trafficking. This applies to all Abt employees, and anyone who represents the interests of Abt anywhere in the world, including partners, vendors, and other third parties. Trafficking includes "the recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud or coercion for the purpose of subjection to involuntary servitude, peonage, debt, bondage, or slavery, and sex trafficking."

Report any concern regarding safeguarding and keeping people safe to the General Counsel (Abt Classic) or Safeguarding Officer (Britain/Australia).

Abt takes a survivor-centered approach when responding to concerns, prioritizing the victim or survivor's safety and confidentiality. Abt will conduct an appropriate investigation,

and appropriate action will be taken in confirmed cases. The consequences of breaching our safeguarding policies includes discipline up to and including termination of employment.

Environmental Sustainability

The health of the environment and livability of the planet are inextricable from people's well-being and Abt's mission. That is why Abt has made a commitment to aggressively minimize greenhouse gas (GHG) emissions within our operations, our supply chain, and within the products and services we deliver to our clients around the world. Key to ensuring we meet our climate commitments is the active participation of our employees and the integration of sustainability practices across business operations. To reduce any negative impact Abt activities may have on the environment, employees should act as stewards of the environment through minimizing their use of natural resources during business operations. This includes complying with all regulatory and contractual obligations related to the environment and taking reasonable steps to:

- Systematically assess and reduce environmental impacts associated with Abt's activities, services, and operations, including in the areas of waste management, energy use, business travel, and resource efficiency, and
- Ensure the organization avoids, eliminates, or minimizes GHG emissions, all other forms of pollution, and the use of natural resources whenever possible

KEYS TO COMPLIANCE: RESPECT

- Treat everyone with respect and keep people safe.
- Do not engage in misconduct with anyone, including employees, consultants, community partners, or subcontractors.
- Do not discriminate on the basis of race, ethnicity, color, religion, gender, sex, sexual orientation, marital status, national origin, citizenship status, age, physical or mental handicap, disability, veteran status, or other characteristics protected by law.
- Do not participate in or ignore any offensive, threatening, or violent behavior.
- Report any misconduct or discriminatory treatment of others per your entity procedures.
- If you experience or observe discrimination, harassment, abuse or exploitation, you can seek confidential support from:
 - Human Resources, the General Counsel and Chief Ethics & Compliance Officer or your Peer Advocate (Abt Classic)
 - The Managing Director of People and Culture, your Safeguarding Officer, or your Peer Support Officer (Abt Britain/Australia)





INTEGRITY

Misconduct

Misconduct occurs when employees act or request that others act in a way that violates the code of conduct, an Abt policy, or an applicable law or regulation, whether in the U.S. or in a country where we work. Misconduct also includes failing to promptly report a known or suspected instance of misconduct, knowingly making a false report, failing to cooperate in an investigation, and retaliation against an employee for making a report.

In this section, we will discuss the more frequently seen types of misconduct, but it is not exhaustive. If you are unsure whether something you witnessed is misconduct, ask.

Accurate Business & Financial Records

Abt expects all staff to create or fill out all records and documentation with accurate, truthful information. Accurate records and disclosures are critical to our company's ability to meet compliance, contractual, legal, financial, and management obligations as well as our credibility in the marketplace.

All financial books, records, and accounts must accurately reflect transactions and events, and conform both to generally accepted accounting principles and to Abt Associates' system of internal controls. You must never knowingly offer or enter misleading or inaccurate information in the preparation of any record or report, or tamper with any record or report. Proper internal controls have been established and must be followed to ensure accurate reports and recordkeeping. Principles of keeping accurate business and financial records include:

- Create business records that are professionally prepared and accurately

reflect the truth of the underlying transaction or event.

- Only sign documents, including contracts, that you are authorized to sign and that you believe are accurate and truthful.
- Do not request improper accounting treatment or seek to influence the audit of financial statements.
- Only authorize a purchase or approve an expense that is needed to conduct the company's business or fulfill a contractual obligation.
- Remember that email memos, voicemail, social network postings, and instant messaging may all be considered business records—avoid exaggeration, derogatory language, and other expressions that may easily be taken out of context.
- Retain, protect, and dispose of records in accordance with applicable policy.
- Do not destroy any records or documents if you are aware of potential or actual legal action or investigation.

Protecting Company Assets

All employees must protect our company assets, such as equipment, inventory, supplies, cash, and information and use our company resources only to conduct company business. Theft, fraud, embezzlement, or other misuse of company property is strictly prohibited.

Information Technology (IT) resources, such as telephones, personal computers, e-mail, and voicemail are provided to us to enable us to do our job at Abt. Each of us has a responsibility to protect these systems and the data that is contained on them from misuse, improper access, damage, and theft.

Principles of protecting company assets include:

- Do not appropriate, borrow, or loan company property without permission.
- Request approval for personal use of company assets such as project vehicles.
- Understand and live up to your role in our system of internal controls.
- Do not allow non-company employees to use company resources without appropriate approvals.
- Only use Abt-approved resources to store, process, and transmit client and company data.
- Do not use electronic media to initiate or participate in any malicious, unauthorized, or fraudulent use of company resources.
- Do not use company equipment or systems to create, store, or send content that is illegal or unprofessional, or that others might find offensive.
- Avoid any use of Abt equipment that might lead to loss or damage, including the introduction of viruses or a breach of our firewalls.

Protecting confidential information

Sharing information with customers and suppliers is necessary to meet the needs of our business and our clients. However, employees are responsible for protecting confidential information belonging to the company or entrusted to it by third parties. Improper disclosure can create serious financial or competitive losses or disadvantages to the company, and legal liabilities to the company and individual employees. In the digital era, pay particular attention to protecting information that is shared via e-mail or the internet, as control of electronic information is easily lost.

Abt Associates information includes all proprietary information that is not generally available to or known by the public, and it includes information in any format including written, electronic, visual, or verbal, including but not limited to: business plans and marketing strategies; financial data and reports; technical data, analytical processes, and trade secrets; information contained in a bid or proposal; cost or pricing data.

Avoiding Conflicts of Interest

A conflict of interest occurs when an employee's financial or personal interests conflict, or appear to conflict, with the interests of Abt. We expect conflicts of interest in our industry, so the important thing is to report any conflict of interest to the Legal team as soon as it arises. The Legal team will evaluate the conflict of interest to determine what, if any, mitigating measures that can be put in place.

As a rule of thumb, avoid situations where a reasonable person would question whether there was an inappropriate influence involved in a business decision. Deal with suppliers, customers, and everyone doing business with Abt objectively, professionally, and fairly.

Some specific examples of potential conflicts of interest include:

- Referring Abt Associates business to a relative or anyone with whom you have a close, personal relationship.
- Holding a financial interest in any firm or corporation that is a competitor of Abt Associates, or that seeks to do business with Abt Associates.
- Offering personal consulting services to other organizations outside of your Abt Associates employment.

Giving or accepting a gift may also create the perception of a conflict of interest. Abt Associates employees and their families may not give or accept gifts or any item of monetary value greater than \$50 in a 12 month period to or from a person or organization with which Abt Associates does business or is engaged in negotiations. Never give or accept gifts of cash or cash equivalents such as gift cards. Never provide any gifts, favors, or entertainment to U.S. federal, state, or local officials.

Integrity in Procurement

Integrity in procurement includes several aspects of compliance: accurate and truthful record keeping, adherence to conflict of interest principles, and fair business practices. Procurement professionals are key gatekeepers to preventing unethical behavior from both inside and outside the company.

Abt Associates employees must refrain from anti-competitive practices and avoid

communications with competitors that create an appearance of collusive conduct. Practices that restrict or eliminate competition, such as collusive bidding and giving or receiving non-public information about a competition, can lead to excessive, distorted, or unfair procurement and may be unlawful. When individuals or companies act in this way, penalties can be very severe for both the company and individuals involved.

Employees should ensure that personal or family relationships not influence or appear to influence objective business decisions. Obtaining competitive bids, verifying quality and service claims on a regular basis, and confirming the financial and legal condition of the supplier are all important steps in a good purchasing decision.

Adhering to anti-corruption laws

Abt Associates complies with the anti-corruption laws of the countries in which it does business and of our clients. You must not directly or indirectly, using personal or Abt Associates resources, offer an unlawful, improper, or corrupt payment or bribe to government officials or a private party. An unlawful payment or bribe includes giving— or promising to give— anything of value to any U.S. or foreign government officials, employees of government-owned or government-controlled enterprises, or political candidates or agents to obtain business or special treatment for the company.

These requirements apply both to Abt Associates employees and to agents working on behalf of the company, such as third party sales representatives and our service providers, no matter where they are doing business. If you are authorized to engage agents, make sure that they are reputable, and require them to agree in writing to Abt Associates' standards in this area.

Ask questions if the circumstances are at all unusual or unfamiliar and watch for “red flags” such as a payment or commission that is larger than is standard for the situation. Perform reasonable due diligence on the business reputation of agents or consultants in high-risk countries or where you may have a concern. Make sure that all agreements are in writing, especially when you are suspicious of the activities of the other party. Additionally, be aware that generally accepted practices in one country, including customary gift giving, may not be lawful or appropriate elsewhere.

KEYS TO COMPLIANCE: INTEGRITY

- Protect Abt assets, including intellectual property
- Be truthful in all business dealings
- Do not lie or deliberately withhold information on official or unofficial documentation
- Work to avoid all perception of conflict of interest
- Do not give or accept gifts outside of the acceptable gift threshold
- Do not give or accept bribes
- Immediately report any witnessed fraud or misconduct in these areas (reporting information below)





BALANCE

Flexibility & Contribution

Abt Associate employees may flex when, where, and how they work to meet both personal and professional commitments. If you supervise staff, you should make sure your staff is aware of the availability of work flexibility and work with them to find a schedule that works for their personal needs and Abt's professional requirements. Employees should work with their supervisors and teams to create a schedule and environment where all employees, regardless of position, can experience balance in their personal and professional lives. Supervisors should make sure staff are aware of all the resources Abt offers to help employees find balance, such as staff care benefits, and not favor employees who do not take advantage of these benefits.

Accounting for Time & Expenses

Abt Associates employees must apply meticulous recordkeeping to all projects, including tracking of hours. Labor is one of the largest costs incurred by Abt. It is critical that each employee complete his or her timesheet daily and record all hours accurately. All hours recorded on your timesheet should be associated with the correct project or overhead charge code (Abt Classic) or should use the correct cost center and contract input code (Abt Australia).

Employees are not allowed to "give" time to the company—all time worked must be charged.

Contractors are held to high standards for accurate timekeeping and billing.

KEYS TO COMPLIANCE: BALANCE

- Encourage your staff to use Abt's staff care benefits
- Do not discriminate or disfavor staff who use staff care benefits or flex their time
- Take your team members into consideration when balancing professional obligations and personal needs
- Be accurate and timely in your timekeeping and billing



ABT'S COMPLIANCE PROGRAM

Seeking Guidance and Reporting Issues

There are many options if you wish to ask a question about ethics or report a concern. If you have questions about the Code of Conduct, or are concerned about conduct that you believe violates Abt Associates standards or the law, talk to your manager. If this seems inappropriate, or if you do not believe the person to whom you've reported your concern has taken appropriate action, you may also talk to:

- A higher level of management
- The Chief Ethics & Compliance Officer (Abt Classic)
- The Legal Department (Abt Classic)
 - o ReportingConcerns@abtassoc.com
 - o WhatsApp: +301-957-0656
- The Ethics Helpline (Abt Classic)
 - o Reporting.Abtassociates.com
 - o 888-928-4231
- The VP, People & Culture (Abt Britain & Australia)

You may report anonymously or request that the party to whom you report keeps your identity confidential. Regardless of the resource you choose to talk to, the company is committed to responding to each situation quickly and completely.

The Ethics and Compliance Helpline and the web-based reporting option, which are managed by a third party company, allow Abt Associates employees to confidentially or anonymously ask questions or communicate potential ethical or noncompliance matters. Your name, if provided, will be shared only with those who need to know to provide an answer to your question or conduct an investigation.

The Audit Committee Helpline

If you have concerns about issues of non-compliance, potential fraud, Code of Conduct violations, or other ethical violations by company officers, the Chief Executive Officer, or a member of the Board of Directors, use the Audit Committee Helpline. Employees should use these procedures to report any concerns regarding. Reports made to the Audit Committee Helpline are received only by the Chair of the Audit Committee of the Board of Directors.

You can reach the Audit Committee Helpline at +1-888-309-1558 or abtassocauditcommitteehl.alertline.com.

Non-retaliation Policy

Abt takes our responsibility to protect reporters of misconduct very seriously. Abt has policies and processes to enable you to raise any matters of concern without fear of disciplinary action being taken against you, that these matters will be taken seriously, and that these matters will be reviewed or investigated appropriately.

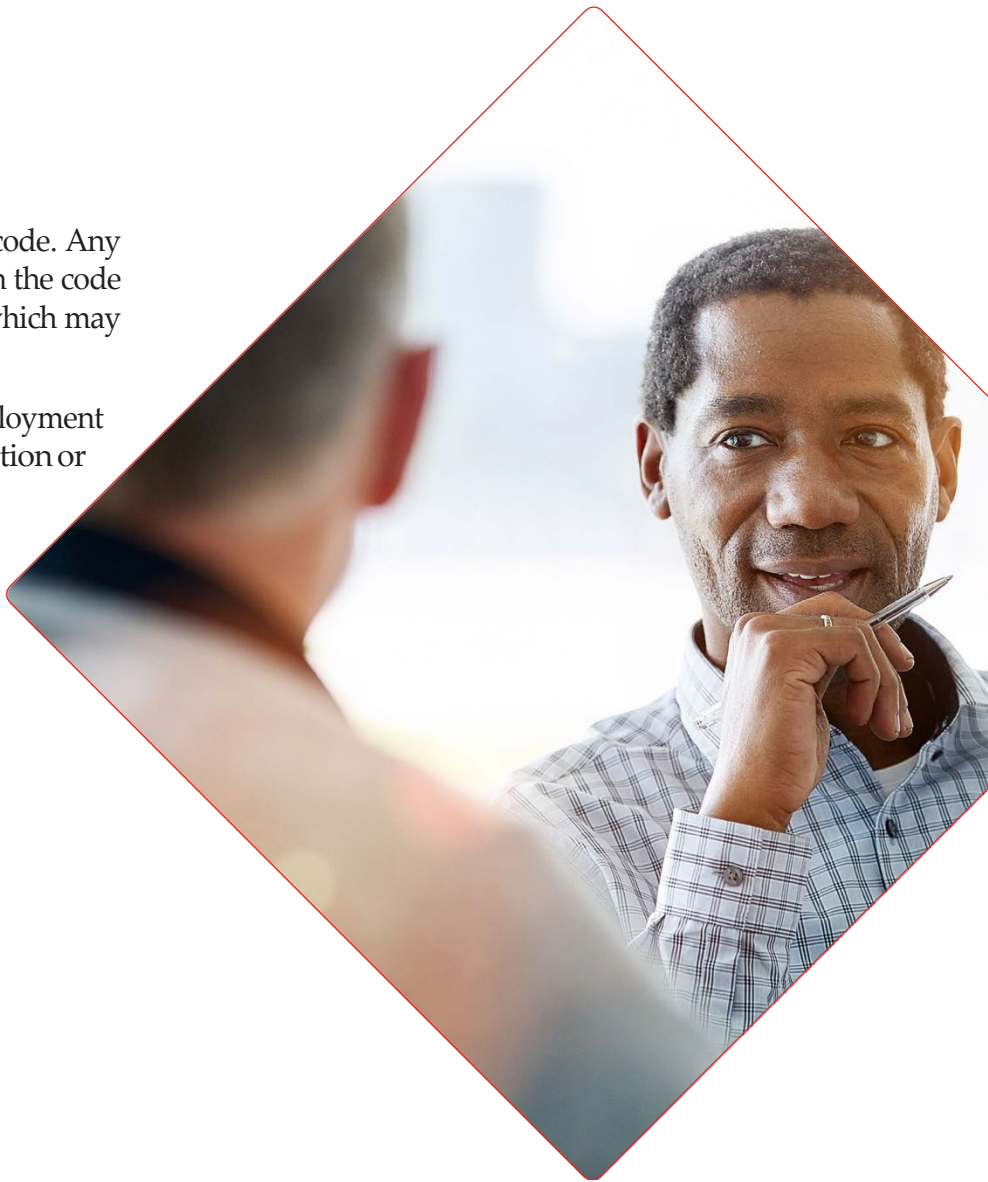
Abt prohibits retaliation, in any form, against anyone who makes a good faith report of a violation or suspected violation of this code, company policy, or applicable law, or who assists in the investigation of a reported violation. Retaliation could include adverse employment actions, acts or attempted acts of interference, reprisal, threats, coercion, or intimidation against employees who report, participate in an investigation, or are responsible for investigating possible improper or illegal activities and will result in discipline up to and including termination of employment.

If you become aware of any act of retaliation, report it immediately to HR, the Chief Ethics & Compliance Officer, or the Ethics and Compliance Helpline (Abt Classic) or the Vice President, People and Culture (Abt Britain and Australia).

Consequences of Wrongdoing

Abt does not tolerate violations of the code. Any employee who violates the standards in the code may be subject to disciplinary action, which may range from a warning or reprimand

up to and including termination of employment and, in appropriate cases, civil legal action or referral to law enforcement.





OVERALL KEYS TO COMPLIANCE

- ✓ Obey the law
- ✓ Know and follow our policies and procedures
- ✓ Be honest and tell the truth
- ✓ Treat others with respect and dignity
- ✓ Never compromise your good name or ours
- ✓ Promptly report concerns about possible violations of this code or applicable law and regulations
- ✓ Cooperate fully with investigations when requested, and protect the integrity of the investigation by maintaining confidentiality
- ✓ Use resources to ask a question or get help when something is unclear or does not feel right

CONTACTS

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HELPLINES

Abt's Ethics and Compliance Helpline, 888-928-4231
Abt's Audit Committee Helpline, 888-309-1558
Abt's WhatsApp, 301-957-0656



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Abt Associates is an engine for social impact, dedicated to moving people from vulnerability to security. Harnessing the power of data and our experts' grounded insights, we provide research, consulting and technical services globally in the areas of health, environmental and social policy, technology and international development.



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