



ABACUS CODE OF CONDUCT

Last Updated: 2026-02-28

This Abacus Code of Conduct ("**Code of Conduct**") is an "Abacus Schedule" that applies to and forms part of the Master Services Agreement ("**MSA**") or applicable Statement of Work ("**SOW**") between Abacus and Client (as "Abacus" and "Client" are defined therein) to which it is attached or in which it is incorporated by reference. Any capitalized term used but not defined in this Abacus Schedule shall have the meaning given, in order of precedence, in the MSA or applicable SOW.

Abacus considers the health and safety of its clients, employees and agents to be a top priority. As such, this Code of Conduct describes Abacus' expectations of the parties and their respective employees' and agents' treatment of the other party's employees and agents, and requires that the party's employees and agents be treated with respect and dignity at all times. Both parties agree that it is their responsibility for ensuring their employees and agents comply with this Code of Conduct.

This Code of Conduct, in relation to each party, strictly forbids discrimination or harassment of any kind, whether based on race, color, national origin, religion, creed, sex, age, physical, mental, or developmental disability, marital status, sexual orientation, or any other reason. Harassment may include unsolicited or unwelcome remarks, gestures, or physical contact, as well as the display or circulation of inappropriate or derogatory written materials or pictures. The following behaviors will not be tolerated by either party: (i) physical violence; (ii) verbal abuse; (iii) sexual harassment and any other form of harassment; (iv) intimidation tactics and/or threats; and (v) bullying.