

# The Maloney Group

## Code of Ethics and Business Conduct

### **Introduction and Purpose-**

Maloney Holdco, LLC DBA The Maloney Group (The Maloney Group) is committed to conducting its business with honesty and integrity and in compliance with applicable laws, rules, and regulations. The purpose of this Code of Ethics and Business Conduct (“the Code”) is to set forth The Maloney Group’s commitment to a high level of moral and ethical standards of business conduct in every aspect of our dealings with employees, customers, regulators, suppliers, partners, and competitors.

As part of our commitment to ethical business practices, the Company has adopted this Code for all officers, directors, managers, and employees of the Company and all of its subsidiaries. Except when otherwise specified, references to “employees” in this Code includes everyone. All employees are expected to know and follow the principles set forth in this Code to ensure that business at The Maloney Group is conducted in accordance with the applicable law, and we enforce compliance with this Code.

The purpose of The Maloney Group Code of Ethics and Business Conduct is to provide general guidance on some common ethical and legal issues employees may encounter relating to our business interests either on or off the job. If you encounter circumstances that call for an interpretation or examination of The Maloney Group policy or any issues discussed in this document, please consult your supervisor or Human Resources. Guidance for reporting suspected illegal or unethical conduct is provided in the last section of this Code of Ethics and Business Conduct.

### **❖ Compliance with Laws**

Employees are expected to conduct Company business in accordance with both the letter and spirit of this Code and all applicable laws, rules and regulations in all cities and states in which the Company operates, including laws related to corruption and bribery.

### **❖ Confidentiality**

During and after your employment with The Maloney Group, employees are expected to maintain the confidentiality of information entrusted to them by the Company and/or third parties, including its customers and suppliers, except when disclosure is expressly authorized or required by applicable law. The Maloney Group defines confidential information as all non-public information and records relating to the Company and its business, customers or suppliers that might be of use to competitors or may be harmful to the Company or its business if disclosed.

### **❖ Conflicts of Interest**

All employees must avoid business and personal situations that may give rise to conflicts of interest. The Maloney Group defines conflict of interest as circumstances where an individual’s private interest interferes with or has the appearance of interfering with the interests of the Company as a whole.

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Examples of actual or potential conflicts of interest may include the following:

- Ownership of, or any other interest in, a company that has done or desires to do business with The Maloney Group
- Placing business with a company that will result in a direct economic benefit to an employee or any member of their family.
- Accepting payments or services from those looking to do business with The Maloney Group or any of its subsidiaries.

Any employee who feels that they may have an actual or potential conflict of interest should address questions or pertinent details to the President or Human Resources.

### ❖ **Protection of Company Assets and Information**

Assets owned by the Company, such as vehicles, equipment, supplies, materials, facilities, software, and intellectual property are valuable resources owned, leased, licensed by or belonging to the Company are to be used solely for Company purposes. Protecting our property from loss, damage or theft and ensuring its proper use is the responsibility of all employees. Employees may not take Company property or assets for personal use or gain, nor may any Company property or assets be given away, sold, or traded without proper authorization from the Chief Executive Officer or President.

### ❖ **Gift Giving /Receiving by Employees**

Maloney Group employees may not offer money, merchandise, services, or other benefits to any existing or potential customer, supplier, or competitor. These actions may be construed as an attempt to influence business decisions or conduct to obtain or retain business. Occasional and customary business courtesies are permitted.

- Meals, refreshments, and entertainment in conjunction with business discussions, if the occasions are not frequent or extravagant are permitted.

Reimbursement of expenditures for meals, refreshments, and entertainment must be documented and approved in accordance with Company policy.

Maloney Group employees may accept meals, refreshments, and entertainment in conjunction with business discussions where the acceptance of such is not illegal, is of nominal value, and is clearly appropriate under the circumstances. While “nominal” is difficult to define by a specific dollar limitation, common sense determination should dictate what would be considered lavish, extravagant, or frequent.

It is the responsibility of all Maloney Group employees to ensure that their acceptance of gifts, meals, refreshments, or entertainment can not be reasonably construed as an attempt by the offering party to secure favorable treatment.

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Should circumstances arise where gifts or other items of value are received but cannot be returned, such gifts or items of value shall be given to the President or Director of Human Resources for disposition.

### ❖ **Unfair Business Practices**

The Maloney Group defines unfair business practices as unethical methods that give a business an unfair advantage. Unfair or deceptive practices or methods of competition, such as the dissemination of rumors or disparaging statements intended to damage competitors to give the Company an unfair advantage in the marketplace is strictly prohibited. All employees shall observe and comply with all legal business practices. No employee, manager, director, or officer of the Company has any authority to engage in or direct another employee to engage in conduct that violates these practices.

### ❖ **Environmental Policy**

Our company is committed to protecting human health and the environment. We integrate employee health, safety, and environmental consideration into all aspects of our operations and processes. The Maloney Group operates in a manner that is environmentally responsible and that ensures the protection of the health and safety of employees and the public.

Employees are responsible for conducting their work activities in a safe and environmentally responsible manner and to bring to management's attention any actual or potentially dangerous condition. Particular attention is paid to the disposal of waste materials. All employees shall be familiar with the laws and regulations that relate to the work they perform. The Maloney Group is compliant with all Federal, State and local environmental laws and regulations.

### ❖ **Compliance and Discipline**

Violations of any of the Code of Ethics and Business Conduct policies will result in disciplinary action up to and including termination of employment.

### ❖ **Reporting**

The Maloney Group encourages employees to report violations or suspected violations of our Code of Ethics and Business Conduct without fear of retribution or retaliation. Any employee that knows of or believes in good faith that there has been a violation of the Code, must report it immediately. In order to foster a comfortable reporting environment, report any violation or suspected violation directly in person or anonymously using the following reporting avenues.

- Direct Supervisor
- President or Chief Executive Officer
- Director of Human Resources

It is the obligation of all Maloney Group employees to uphold the policies in our Code of Ethics and Business Conduct. If you have any questions regarding the policies, please contact Human Resources at (209) 636-5315.