

Atlas impact

atlas

ESG Report

2023



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Introduction

At Atlas, we are invested in the people and the communities where we work and the sustainable economic future of the countries where we collectively live.



A Letter from Our Chief Human Resources Officer (CHRO)

Atlas' unprecedented global reach gives us a unique opportunity to care for our planet, the communities where we work, and the sustainable economic future of the countries where we collectively live. ESG is high on our strategic agenda and, in 2022, Atlas launched our **impact** program.

impact ensures that we define and adhere to a set of ESG principles and pillars that guide our decision-making and enhance our ESG performance. Our **impact** program is central to our vision as a business and at the heart of our culture.

With **impact**, we promote diverse, inclusive environments in our business operations. We foster a network of customers and employees focused on ensuring an equitable global environment. We establish accountability systems and processes to measure and increase our influence on each of the ESG pillars.

I am incredibly proud to present our very first **impact** ESG report outlining our ESG strategy, metrics, and initiatives, including some of the following highlights:

ENVIRONMENT:

Atlas is building sustainable operations to reduce our environmental footprint by reducing waste and energy consumption. We are dedicated to becoming a steward of the environment. In 2023, our **impact** program will ensure we have systems and processes in place to measure and improve our environmental footprint.

SOCIAL:

Perhaps the closest to my heart as a CHRO is diversity, inclusion, equity, and belonging. I am so proud that this is in Atlas' DNA. Atlas promotes a diverse and inclusive environment in attracting, retaining, and developing our employees. As a business, we want to embed practices that support and promote workforce diversification, wellness, and philanthropy. Our **impact** team implemented our

Communities (employee-led resource groups) for Women, Environmental Advocates, LGBTQIA+, and Parents in early 2023. In 2022, we launched our Employee Assistance Program (EAP) as a new benefit to support our wellness initiatives. Our next endeavor is working to expand our contributions to the communities where we live and work through employee volunteering and charitable giving opportunities.

GOVERNANCE:

Atlas is committed to operating lawfully, ethically, and responsibly, following the necessary policies and best practices to preserve the trust of our customers and employees. **impact** will ensure that all governing policies and supporting initiatives are documented, executed, and communicated. We have a Code of Conduct and core policies in place, including diversity and inclusion, anti-discrimination, anti-harassment, anti-bullying, anti-bribery and anti-corruption, anti-money laundering, data protection, and anti-modern slavery.

I am committed, along with the leadership team, to leading by example when it comes to ESG. That means ensuring that our business practices align with our **impact** principles. We seek to invest in sustainable technologies and initiatives, foster a diverse and inclusive workplace, and maintain transparency and accountability in all that we do.

We are very proud of the progress we have made on our ESG journey, but it has only just begun. I look forward to sharing our progress throughout this journey while we continually learn and improve **impact** to create a better world for us all.

Sincerely,

Lulu Rufael
Chief Human Resources
Officer (CHRO)



About Atlas

At Atlas, we believe that businesses need to be able to hire the right talent, wherever that talent may be globally, to remain competitive. Atlas was built on years of experience navigating the challenges of quickly deploying and paying international employees while ensuring compliance with local regulations.

Atlas offers expertise and flexibility for companies to expand across borders, onboard talent, manage compliance, and pay their global workforce without the need for a local entity. As the largest direct Employer of Record (EOR) with entities in over 160 countries, we deliver on that promise. Atlas brings localized experience and expertise into an enterprise-grade technology platform that supports thousands of companies and remote teams.

The Atlas platform is uniquely designed to deliver end-to-end EOR solutions and empowered user experiences that provide self-service capabilities and real-time insights that lead to improved business outcomes.

Learn more at atlasHXM.com



Our Mission

To guide companies on their growth journeys with software and solutions that enable global talent management.



Our Vision

We see a future where growth thrives across borders and cultures.



Our Values

Passion

Purpose-driven: We are driven by our passion and engage in everything we do.

Influential Innovation

Value creation: We challenge the status quo to re-imagine and anticipate the needs of the market.

Trust & Diversity

Human-centric: We celebrate diverse perspectives and foster an environment of trust and accountability.

Sustainable Growth Strategy

Atlas is a leader in the Employer of Record (EOR) market. We pioneered the direct EOR model and have increasingly built out capacity and offerings in local jurisdictions across the globe. This strategy is critical in supporting our sustainable growth objectives and setting the direction that will support the new post-pandemic world of work.

The ability to sustain growth and act as an ethical partner to the communities where we work and live is important to us. Our company strategy for sustainable growth includes the following:



'Glocal' Growth

Enabling unmatched growth, globally and locally, by connecting companies with diverse talent in all parts of the world.



Emerging Markets Opportunity

Creating unprecedented opportunities for companies and talent in new and emerging markets.



Scale Responsibly

Ensuring compliance and ethical business practices are at the core of our plans to scale the company.

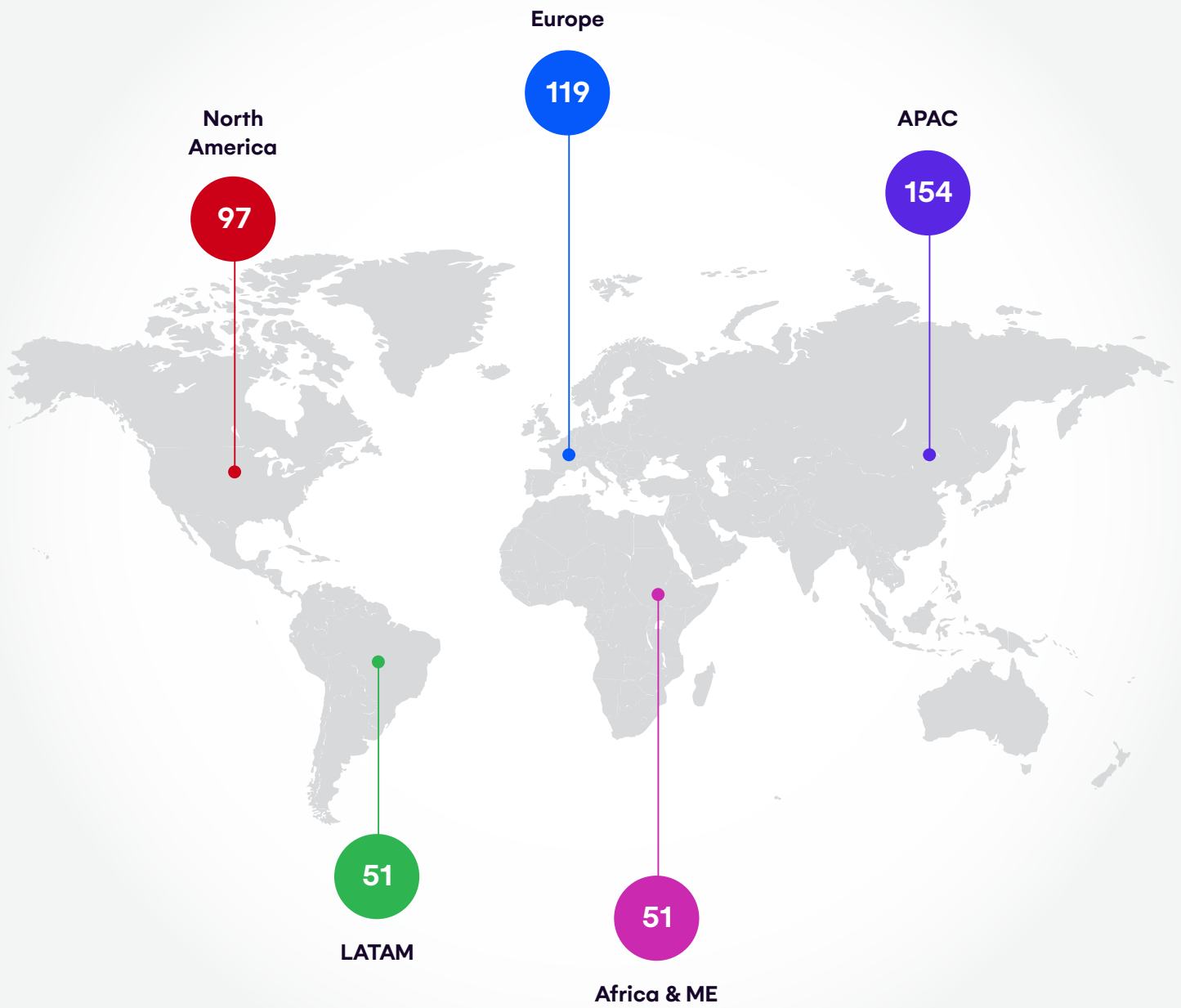


Extension of Excellent Service

Continually evaluating the value proposition Employer of Record services brings our customers while expanding capabilities to increase value to our employees and customers.

Our Global Workforce

472 Global Workforce



Awards & Recognition

2023

Leader in Everest Group’s “Employer of Record (EOR) Solutions PEAK Matrix® Assessment 2023”

Industry Leader in Nelson Hall’s Global Employer of Record Report

Employer of Record Organization of the Year, 2023 – Global Payroll Association

Named as a Top Software Provider in Four Categories – SelectSoftware Reviews

2022

Leader in Everest Group’s “Employer of Record (EOR) Solutions PEAK Matrix® Assessment 2022”

Industry Leader in Nelson Hall’s Global Employer of Record Report

Prism Award for Shared Services— American Payroll Association

Best Advance for Technology Innovation for the Remote Workforce – Brandon Hall Group

2021

Fast 50 2021 – Crain’s Chicago

Entrepreneur of the Year 2021 – EY

5000 Honoree 2021 – Inc.

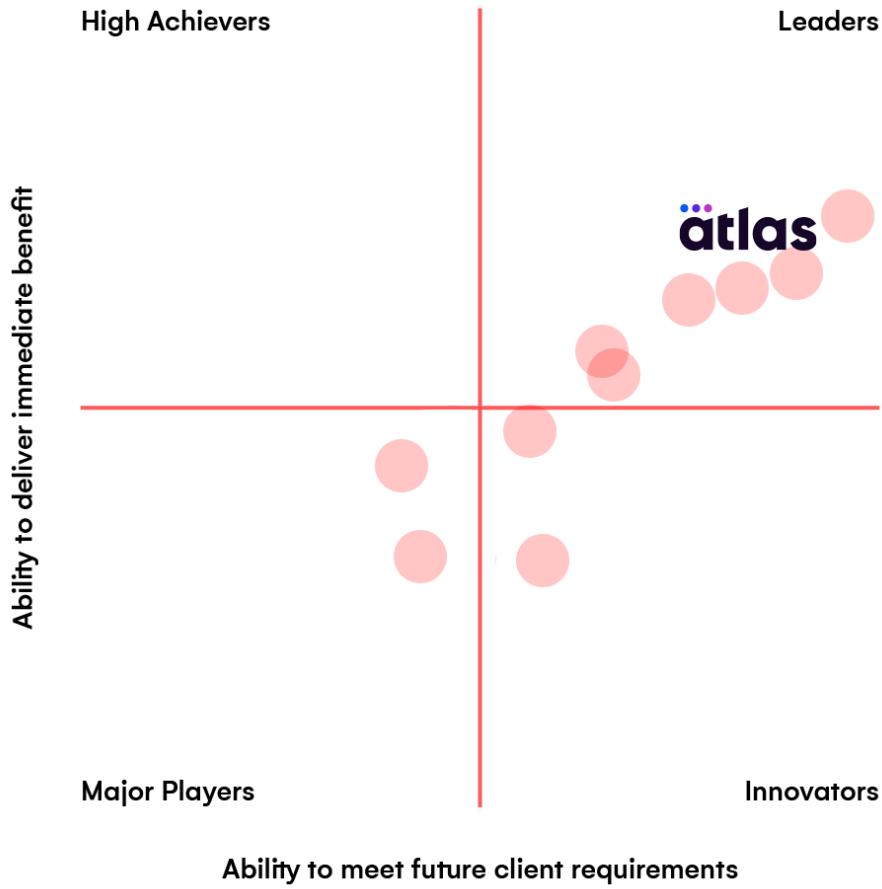
Prism Award for Shared Services – American Payroll Association



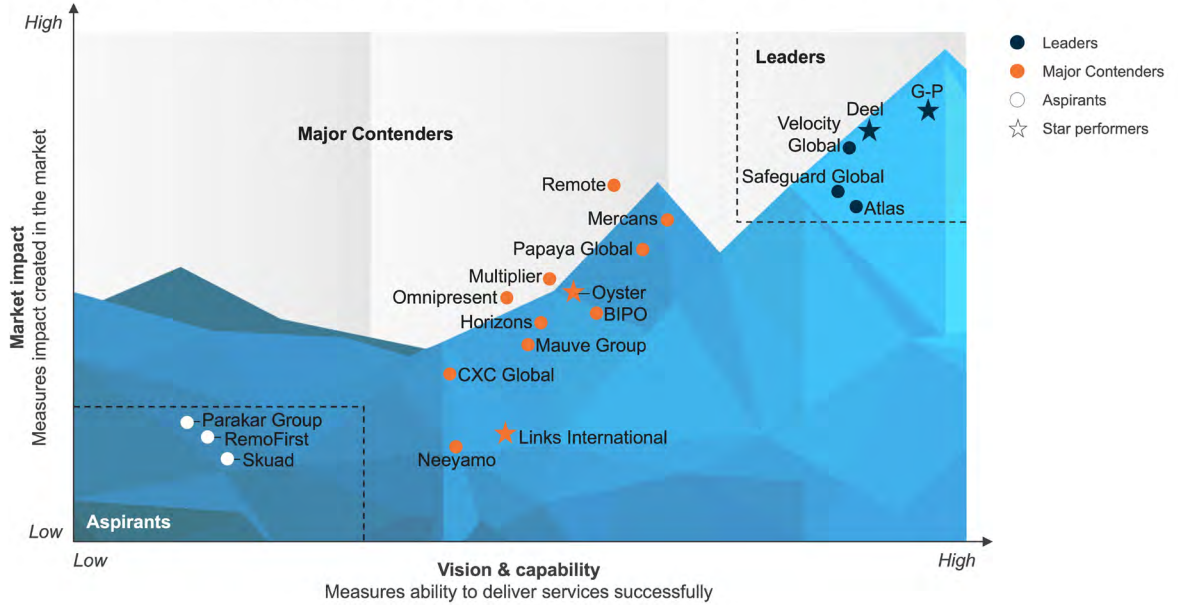


Global EOR Services 2023

Overall



Everest Group Employer of Record (EOR) Solutions PEAK Matrix® Assessment 2023¹



¹ Assessment for CXC Global, Horizons, Mauve Group, Omnipresent, and Skuad excludes provider inputs and are based on Everest Group's proprietary Transaction Intelligence (TI) database, provider public disclosures, and Everest Group's interactions with buyers
Source: Everest Group (2023)

About This Report

Our first impact ESG Report showcases our comprehensive ESG strategy, detailing our initiatives, objectives, and performance for the year ahead.

Our report also highlights our vision for the future of the **impact** program, demonstrating our commitment to transparency and continued growth in our ESG efforts. We will hold ourselves accountable and release annual reports tracking the progress of our **impact** program.

Our priorities align closely with the following widely recognized sustainability standards; the Sustainability Accounting Standards Board (SASB) Software & IT services sector standard, and the Global Reporting Initiative (GRI) standards. These benchmarks have served as a guide for our processes and metrics when preparing this report.

As a global organization, Atlas strives to break down barriers across the global talent marketplace. Our commitment to ESG principles aligns with the United Nations Sustainable Development Goals (SDGs).

We have identified eight highly relevant SDGs to our business and stakeholders and where we can make the most significant impact. These eight SDGs serve as a robust framework for advancing sustainable and equitable practices worldwide.



impact Strategy and Approach

The mission and vision of impact drive not only our program, but components of our overall business strategy as well. Our impact pillars set the foundation of our business strategy to ensure that our commitment to ESG remains at the core of what we do.

Our **impact** Pillars are:

Environmental

Atlas is building sustainable operations to reduce our environmental footprint by optimizing waste reduction and reducing energy consumption.



Social

Diversity and inclusion, employee wellness, volunteering, and charitable giving are at the core of our social responsibility. Atlas promotes a diverse and inclusive environment through the methods we employ to attract, retain, and develop our employees.



Governance

Atlas is committed to operating lawfully, ethically, and responsibly, employing the necessary policies, and best practices to preserve the trust of our customers and employees. Establishing accountability mechanisms, refining our systems, and optimizing our processes, will help us measure and increase our influence on each of the **impact** pillars.



impact Timeline

Since launching **impact** in 2022, we have developed a purpose-driven program of ESG activities and initiatives at Atlas. We aim to embed these ESG principles in our company culture and business practices to drive sustainable long-term impact and change.

Our ESG program timeline outlines the continual progression of activities and changes that we have implemented.

- **impact** ESG Program Creation – **May 2022**
- Women in Tech at HR Tech – **September 2022**
- Established Committees for the Board of Directors – **October 2022**
- Internal **impact** Launch – **December 2022**
- Engaging Our Investment Partners: Working Session with Guidepost – **January 2023**
- Launched Atlas Communities – **January 2023**
 - Women’s Community – **January 2023**
 - Planet A (Environment Community) – **February 2023**
 - Pride (LGBTQIA+ Community) – **April 2023**
 - Parents With Purpose Community – **June 2023**
- International Women’s Day Event: Women in the C-Suite – **March 2023**
- Launched New Ethics Line Reporting Platform with Updated Ethics Line Whistleblower Policy – **March 2023**
- Published revised Code of Conduct – **March 2023**
- Unconscious Bias Training – **May 2023**
- ESG Policy – **June 2023**
- Guidepost ESG Symposium – Guest Speakers presenting Case Study – **June 2023**

Environmental

The environmental pillar of our Atlas impact program is fundamental to us considering our expansive global footprint.



Our Environmental Sustainability Strategy

Atlas strives to be a strong environmental advocate for sustainable business practices, such as using efficient energy options and applying waste reduction measures throughout all our locations.

We recognize that environmental issues such as climate change, ecosystem pollution, and waste generation are global challenges that everyone must recognize and address.

Our environmental sustainability strategy is aligned with the following two UN Sustainable Development Goals (SDGs): #12 Responsible Consumption and Production and #13 Climate Action



ENERGY AND EMISSIONS

Atlas is thoughtful about reducing energy consumption and carbon emissions in our offices. That includes everything from planning our facilities footprint to simple energy-saving habits that all employees are encouraged to follow, including:

- Energy-efficient (LED) lighting, HVAC control systems, and regular systems evaluations.
- Using energy-efficient appliances.
- Promoting behavioral change campaigns, like our “last person out” best practice that promotes energy savings by powering off lights and electronics at the end of the workday in our offices.
- Planning for remote or local business meetings whenever possible to help reduce emissions from air and automobile travel.

At the end of 2022, we began gathering metrics and data about our carbon footprint to establish our baseline and determine areas for improvement. We will gather and analyze our footprint annually based on the following metrics:

- Global energy consumption in our offices.
- Emissions associated with operational shipments, which we gather from our courier providers.
- Business-related travel emissions data obtained from our travel management provider.

WASTE

We have committed globally to minimizing waste in our business operations and practices through several programs and initiatives, including:

- The implementation of waste reduction programs that promote education and sustainable practices in our offices. These include properly labeling of waste and recycling bins and using reusable silverware, plates, and bowls throughout our offices.
- The reduction of paper usage in favor of online e-signature tools and partnerships with vendors to responsibly manage our electronic waste globally.
- Education for our employees on the importance of supporting our company culture of sustainability and environmental stewardship.

OFFICES

Wherever possible, we have partnered with certified green building spaces so that the offices we lease follow global environmental standards. These are efficient and cost-effective, providing healthier workspaces for our employees and the environment.



PLANET A COMMUNITY

Atlas impact communities are employee-initiated and led resource groups that our senior leaders sponsor.

In February 2023, Atlas employees established the Planet A Community. Planet A partners with executive sponsors to define the program, educate employees, implement sustainability campaigns, and help bring sustainable environmental practices into our business processes.

Planet A Goals:

- Contribute to Atlas’ environmental goals.
- Increase employee engagement and education on environmental sustainability through events, training sessions, and other resources.
- Support community-based initiatives that promote environmental sustainability and provide employee volunteer opportunities.
- Continuously measure and report on the group’s progress and impact and use this information to refine and enhance its efforts.
- Foster a culture of environmental responsibility and sustainability within the company and encourage all employees to act.



Social

The social component of our impact program aligns with our company values of Trust and Diversity.



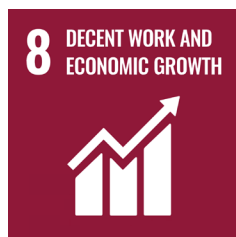
Social Strategy

We want employees to feel they belong at Atlas and can contribute to our success, regardless of their location or other unique attributes.

From initial recruitment to development and promotion, we hold closely to our diversity values from end to end in the employment lifecycle.

Our corporate philanthropy mechanisms, including volunteering and charitable giving opportunities, allows our employees to give back to the causes that are important to them. In 2023, we plan to increase our focus on this area to offer opportunities to connect our employees toward common goals that help our communities and society.

Our social strategy and initiatives align with the following five UN Sustainable Development Goals: #3 Good Health and Well-being, #4 Quality Education, #5 Gender Equality, #8 Decent Work and Economic Growth, and #10 Reduced Inequalities



Talent and Culture

ATTRACTION AND RETENTION

At Atlas, we focus on removing boundaries for our customers and for our employees in a variety of ways. With internal employees residing in 32 countries and across 53 nationalities, our global talent footprint continues to grow. We have flexible working arrangements that allow employees to work remotely, and we support them with the tools they need to be productive.

Employees are encouraged to grow at Atlas through skills development, career advancement, and personal development, including many online courses available through our learning platform.

We are strengthening our Atlas internal communications strategy and improving the structure and content of our intranet platform, People Connect. This is a centralized hub for all employees to learn about company news, access learning, share information and recognition.

The ‘Voice of Employees’ is captured during onboarding and offboarding, quarterly employee engagement surveys, pulse surveys, and through global and regional “employee listening tours.”

EMPLOYEE AWARDS AND RECOGNITION

Employee recognition happens daily at Atlas through our People Connect platform. Employees and managers are encouraged to share updates on achievements across the organization. We formally recognize employees annually with awards based on peer submission and selection by our Chief Executive Team.

EMPLOYEE BENEFITS

Our internal employees are the key to success, and we must offer them a well-rounded set of benefits to help them manage their health and well-being.

We are champions of support for work/life balance for internal Atlas employees, including:



Healthcare benefits, defined by country.



Unlimited paid time off policy and statutory time off entitlements.



A comprehensive Employee Assistance Program (EAP), which includes online content, phone support, and counseling sessions in their local language. Our EAP program includes additional resources for legal, personal, and family support.



Atlas offers a parental leave program in accordance with local requirements.



LEARNING AND DEVELOPMENT

Developing our people is a core part of our strategy. As part of goal setting, we require employees to spend at least 40 hours per year on learning activities and mandatory compliance training.

We offer access to unlimited online learning through Coursera with courses that support professional and personal development. The classes are designed and taught by industry experts, esteemed academics, and universities. They are flexible and allow employees to take courses when the timing works best for them.

Our internal Learning and Development (L&D) team develops customized internal content to support the Atlas Learning Community, working with content experts. Our L&D courses include employee and manager skills, business processes, and compliance courses, and many are offered through cooperation with top universities.

Employees are formally encouraged to provide feedback on their need for additional learning opportunities in our employee engagement survey and focus group sessions. In addition, each department is responsible for delivering role-based training.

The Top Training Areas for Atlas Internal Employees in 2022.

- Business Skills
- Leadership
- Communication
- Project Management
- Product Management

ATLAS TRAINING AREAS BREAKDOWN



14,396

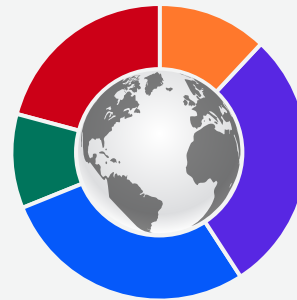
learning hours completed by Atlas employees in 2022



497

Atlas employees received Coursera certifications in 2022

TOTAL LEARNING HOURS BY REGION



● Africa and ME	1,541
● APAC	3,744
● Europe	3,606
● LATAM	1,310
● North America	2,680

Volunteer Opportunities

Our impact volunteering initiative is a three-pronged approach for individual, local, and global programs. Employees are encouraged to take time to give back to society and volunteer with organizations of personal interest. Atlas also supports employee group activities that align with our company mission and values.

Participating in volunteer opportunities is an enriching experience where employees gain leadership recognition for their efforts as personal and professional growth. We believe our community is made stronger by joining those causes we care about.

impact 3-Pronged Volunteering Program

INDIVIDUAL

Our individual employee volunteer program is designed to allow employees to volunteer for programs that are important to them.

REGIONAL

Employees take the lead in forming a group/activity to give back in their local areas.

GLOBAL

Atlas will join forces with non-profit organizations to meet common goals based on shared values.



Employee Health and Wellness

Atlas is committed to protecting the health, safety, and wellness of our employees and visitors, who must follow our training programs, specific rules and instructions, and act reasonably to protect themselves and others from harm. Our employees are required to review and acknowledge our Code of Conduct, which outlines our health and safety measures.

All internal employees have access to a comprehensive Employee Assistance Program (EAP), including online content, phone support, and counseling sessions in their local language.

HUMAN RIGHTS

We have a policy that is shared with all employees around modern slavery. If identified, the policy outlines employee responsibility and the necessary steps to report their concerns.



Diversity, Equity, Inclusion and Belonging (DEIB)



At Atlas, we see the value of diversity, equity, inclusion, and belonging as a competitive advantage. This inclusiveness aligns with our values of Trust and Diversity. Our internal employee workforce represents 53 different nationalities and more than 90 languages with approximately 50% of our team members identifying as female. We embrace individual uniqueness in sexual orientation and gender identity for our leaders and all employees.

Our Workplace Diversity & Inclusion Policy outlines our commitment to the principle of equal employment opportunity for all employees and to providing employees with a work environment free of discrimination and harassment.

All employment decisions at Atlas are based on business needs, job requirements, merit, experience and aptitude, without regard to differences such as differences in gender, age, language, cultural background, sexual orientation and gender identity, health/medical condition, religious beliefs, physical ability, appearance, working style, educational level, professional skills, work and life experiences, socio-economic background, job function, marital status, family responsibilities, or political affiliation.

Atlas will not tolerate discrimination or harassment based on any such characteristics, or any other status protected by the laws or regulations in the locations where we operate.

Our senior leadership team and HR have embraced these principles and have developed talent programs to attract, retain, develop, and recognize our employee base. We provide the framework for employees to engage around their unique identities and embrace the differences that enrich our company culture. Some of our programs and initiatives that promote DEIB include:

- **Atlas Communities**, where employees can connect their unique but shared identities and values with others from across the organization and the globe.
- **Our People Connect intranet**, which enables employees to join groups and communities that are matched to their specific interests and needs. On People Connect, employees can celebrate each other for their successes, ask their colleagues questions, or just shout out to celebrate a holiday or personal event.

DEIB EDUCATION

Both global and local initiatives encourage employees to embrace their diverse identities and the differences that enrich our company culture.

Most recently, we added unconscious bias to our employee training program. Unconscious bias impacts everything from hiring practices to promotions, teamwork, development, and communication. Our unconscious bias training helps employees increase their awareness of the existence and effect of unconscious biases. It also provides them with strategies for identifying and addressing them, as well as techniques for creating a more inclusive and equitable workplace culture.

ENGAGEMENT FIGURES & APPROACH

Employee engagement information is captured through one-on-one conversations with managers, small group listening exercises, and anonymous surveys conducted throughout the year. The results of the surveys are shared with our employees, and action-based teams are created that engage the employees in developing recommended solutions to improve our business practices.

Atlas impact Communities

impact Communities are an extension of our commitment to DEIB. These groups, created and led by our employees, celebrate shared identities, special interests, and unique life experiences. Communities weave a sense of belonging and inclusion into the employee experience.

Our goal is to connect people across Atlas and help community members achieve professional success through education, mentorship, and mutual support by sharing stories, feedback, ideas, and best practices across levels, departments, and regions.

Our Atlas **impact** Communities enable employees to:

- Connect with colleagues from across the globe in different departments and functions.
- Promote cultural awareness and acceptance.
- Share knowledge and diverse perspectives.
- Connect with a network that can provide coaching and mentoring opportunities.
- Gain visibility within Atlas and benefit from the group's collective voice.



We launched our **impact Communities** in January 2023 and witnessed immediate excitement from our employee base. In the first months of this program, employees created four distinct communities and began connecting with each other.

Our four active communities are:



WOMEN

The mission of the Womens' Community is to create an inclusive global community that connects women across Atlas to help them achieve professional success through education, mentorship and mutual support. With approximately 50% of Atlas identifying as female, we can make a huge impact on the organization, our communities, with our customers, and each other.



PARENTS WITH PURPOSE

Parents with Purpose is a safe, supportive, inclusive community for employees who are parents or who are interested in all things parenting. The community's mission is to support and empower each other with resources and tools to navigate the challenges of parenting and balancing work priorities. We aim to create a safe space where we can come together to share experiences, offer advice and guidance, and learn from one another.



PLANET A

Planet A is a group dedicated to education, best practices, and actions that make our workplace and homes more sustainable and respectful of the environment. See our Environmental section for more details on this community.



PRIDE

The Pride community fosters an inclusive global workplace for LGBTQIA+ community members, in partnership with our allies. Pride promotes and encourages education on issues that specifically pertain to LGBTQIA+ individuals.

We support our communities by:

- Publishing clear guidelines and processes for employees to propose a new community or join an existing one.
- Providing executive sponsorship to every community to help it achieve its goals and make an impact on the broader organization.
- Creating an intranet site dedicated to fostering communications and collaboration for each community.

Our impact Communities Vision for 2023

- In 2023, we anticipate the creation of even more **impact** communities.
- We will continue encouraging employees to foster a sense of belonging through the creation of communities that match their identities.

Metrics



GENDER

Our employee base is approximately 50% male, 50% female across all of Atlas. This is seen within and across all regions, generations, and job levels.



GENERATIONS

Our employees represent 4 generations with ~70% millennials across all regions and job levels. This offers diverse mindsets, process management, and technical skillsets.



NATIONALITY

We are a global company with over 50 nationalities represented in our workforce.



NUMBER OF EMPLOYEES

Currently, we have 472 internal employees.

Governance

The governance pillar of our impact strategy is designed to firmly embed ESG principles across our entire organization.



Governance Strategy

From decision-making through to managing business risk, Atlas is committed to upholding the highest ethical standards throughout our governance processes.

Our governing bodies regularly review our business objectives and results to ensure compliance with oversight practices and retain transparency, which is essential to the continued success of our **impact** strategy.

Our governance strategy aligns with the following UN Sustainable Development Goal: #16 Peace, Justice, and Strong Institutions



The Board of Directors (“Board”)

Our Board is comprised of eight independent (also known as non-executive) directors. These members are diverse in thought, experience, and accomplishments.

The Board has diverse representation, including ethnicity, gender, and sexual orientation. Having board members with different backgrounds, skills, and experiences provides Atlas with valuable insights and perspectives that ensure we navigate complex issues and make informed decisions.

RISK AND COMPLIANCE OVERSIGHT

Our Board provides oversight to our risk and compliance program through committees.

- The Audit Committee regularly reviews company financials and controls with participation from the Chief Financial Officer (CFO).
- The Compliance Committee has the responsibility for understanding high-level business risks and the treatment plan for those most critical to the organization. The Chief Risk Officer (CRO) dotted line reports to this Committee.

Atlas has an Executive Risk Steering Committee that helps guide the risk framework and evaluates our overall risk profile.

Our Board has established an Audit Committee, a Compliance Committee, and a Compensation Committee. Each committee is governed by a charter that has been reviewed and approved by the Board. These committees are comprised of Board members who regularly meet with members of the Chief Executive Team (CET) to review the business and provide input.

The executive committee members have domain expertise to assess risk for the company, leveraging their insight of the strategic plans, operational functions, and initiatives at Atlas. This team identifies critical risks that will be raised to the Compliance Committee for review.

The Executive Risk Steering Committee is comprised of the Chief Executive Officer, Chief Risk Officer, Chief Financial Officer, Chief Legal Officer, Chief Operations Officer, Chief Technology Officer, and Chief Information Security Officer.



Risk Management

Risk management is an essential part of our governance and **impact** strategy. It enables Atlas to make informed risk mitigation decisions guided by our ESG principles.

Atlas proactively identifies, monitors, and mitigates risk to the company's business objectives. Our established Risk Framework incorporates a system of monitoring, learning, and improving performance. Risks are categorized and prioritized in the following areas: Financial, Growth, Customer, People, and Compliance. Risk and Compliance is responsible for managing the risk register and risk treatment plans and assigning accountable owners. Risk oversight is provided by the Compliance Committee, and risks are discussed in each meeting of this team.



Privacy

Atlas is committed to protecting the confidentiality and integrity of personal data for which we are responsible throughout our business operations. The company's privacy program is overseen by the Chief Risk Officer and critical risks pertaining to this domain are reviewed by the Compliance Committee.

The company has a dedicated privacy team with a remit that includes, but is not limited to, privacy governance, privacy assessments, employee training and awareness, data management and flow, and policy compliance.

Cybersecurity

Atlas is committed to protecting the data of our employees, contractors, and customers through our cybersecurity program. Our program is informed by the standard industry best practices of ISO 27001, SOC2, and NIST.

Atlas enforces multiple lines of defense from cybersecurity threats to protect confidential information and ensure the integrity of our collective data.

Ethical Conduct

POLICY COMMITMENTS

Atlas has a Code of Conduct and company policies and procedures. The Code of Conduct applies to employees, contractors, officers, and directors of Atlas. The Code of Conduct guides our behaviors and reflects our company values.

Our policies reflect local requirements and global best practices and protect the organization and our employees and customers from poor business practices. Atlas maintains policies as part of our commitment to ethical business standards:

- diversity and inclusion
- anti-discrimination, anti-harassment, and anti-bullying
- data protection
- anti-bribery and anti-corruption
- gifts and entertainment
- sanctions
- anti-money laundering and counter-terrorism financing
- anti-modern slavery

ETHICS LINE WHISTLEBLOWER POLICY

Atlas is dedicated to upholding lawful and ethical business practices. We have an Ethics Line Whistleblower Policy that governs how we address misconduct in our business activities.

Ethics Line is the confidential reporting mechanism for employees to report potential fraud or ethics violations related to Atlas' business operations. Ethics Line is available 24/7/365 to our employees and other eligible people. Integrity Counts, a certified global provider of ethics reporting, hosts our Ethics Line.

INTEGRITY **COUNTS**

 **WHISTLEBLOWER
SECURITY**

Governance Trainings

In 2022, all internal employees were required to participate in the following compliance training:

- Anti-Harassment (including Anti-Sexual Harassment)
- Data Protection, Anti-Money Laundering, and IT Awareness and Phishing.

100% of employees complete governance mandatory training during onboarding and then must complete refresher training annually.



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Atlas Technology Solutions, 1 North Franklin, Suite 2600,
Chicago, Illinois 60606, United States

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