



COMPREHENSIVE ADULT STUDENT ASSESSMENT SYSTEMS

CASAS Code of Conduct

Introduction

At CASAS (the Organization) we are committed to operating with the highest ethical standards and conducting its business in compliance with all applicable laws and regulations. Based on this commitment, our Board of Directors has adopted this Code of Conduct.

The Code is intended to promote honest and ethical conduct, compliance with applicable laws and regulations, and ensure the protection of our organization's interests, including employees, intellectual property, data, information, and assets. The Code does not summarize every applicable law or regulation nor does it, or can it address every issue or situation in which ethical decisions must be made. Rather, this Code sets forth key guiding principles of business conduct that anyone who works at or with CASAS is expected to follow.

Please review the Code carefully and become familiar with its provisions. You are responsible for understanding the Code and how it affects your daily activities. If you have questions, you have an obligation to seek out answers.

If you see violations of this Code, CASAS policy, or applicable law, report them internally for action and follow-up.

Following the CASAS Code of Conduct is a responsibility we all share. Together we are committed to being an organization that reflects the very best of CASAS, its people, practices, and purpose.

Who Is Covered by This Code

The Code applies to all our employees, consultants, temporary workers, officers, and members of the Board of Directors, regardless of location, seniority level, function, or region. Contractors, vendors, and business partners serve as an extension of the organization. They are expected to adhere to the spirit of this Code, as well as any applicable contractual provisions, when working for the organization.

How We Conduct Business

It is up to each of us, every day, and in everything we do to hold ourselves to the highest standards and uphold our core values as we carry out our work.

a. Conflicts of Interest

A conflict of interest arises when personnel act or enter into relationships that oppose the interests of the organization or interfere with their performance or independent

judgment when carrying out their duties. Personnel and their immediate families may not take any action or have or enter into any relationship that may create a conflict of interest without the prior review and approval by the CASAS Executive Management team in accordance with the CASAS's Conflict of Interest Disclosure policy.

Although it is not possible to list every conceivable conflict, the following are examples of some common scenarios.

- **Improper Personal Benefits**
Conflicts of interest can arise when you or a member of your family, or someone with whom you have a personal relationship, receives improper personal benefits as a result of your position with the organization.
- **Financial or Employment Interests in Other Businesses**
You may not have an employment, consulting, or other financial relationship with any other enterprise if that interest compromises, or appears to compromise, your loyalty or objectivity to the organization.

Report Potential Conflicts of Interest

You should use good judgment in deciding whether you are facing a potential conflict of interest or whether others may believe there is the appearance of a conflict of interest. If you are in such a situation, disclose it immediately to your manager/supervisor and obtain approval in accordance with the CASAS's Conflict of Interest Process.

Employee Responsibilities

- Always make business decisions that are in the best interest of the organization.
- Never take a business or investment opportunity for your personal advantage if you obtain information about that opportunity in the course of your duties with the organization.
- Always follow the organization's procurement policies and processes and obtain approval before engaging or directing business to suppliers or other business partners when you know they are owned or managed by your family members or someone with whom you have a personal relationship.
- Always obtain prior approval from your manager/supervisor before accepting any outside employment to be performed while employed by CASAS. If the secondary employment could create a conflict of interest, you must also obtain approval from the CASAS Executive team.
- Do not solicit any personal gifts, favors, entertainment, or services.
- It is never okay to accept gifts of cash or cash equivalents, such as gift cards from suppliers, customers, or other business partners.

- If you think you may have a conflict of interest or are in a situation that could be perceived as a conflict of interest, immediately report it to your manager/supervisor.

b. Compliance with Law

You are required to follow high ethical standards and comply fully with both the spirit and the letter of all applicable laws and regulations. You must observe these standards when addressing the special requirements often associated with government transactions or when dealing with government officials, representatives, or agencies. Whenever a law or regulation is unclear or seems to conflict with either another law or any provision of this Code or other CASAS policy or procedure, you should seek clarification from your manager/supervisor. If your manager/supervisor is unable to assist, you should seek clarification from the CASAS Executive team.

c. Bribery and Corruption

CASAS prohibits bribery and corruption in any form, including directly or indirectly giving, offering, accepting, or authorizing bribes. We comply with the anti-corruption laws of every country in which we conduct business. We expect our contractors, vendors, and business partners to maintain the same standards when acting on our behalf.

Employee Responsibilities

- Do not give or accept bribes or kickbacks or any other kind of improper payments, which can include, for example, cash, gifts, or anything else of value.
- Exercise caution before providing anything of value to a government official or local institutions and be sure to follow all applicable organization policies and local law.
- Consider our anti-bribery policy and procedures when selecting business partners and monitor their behavior.

d. Fiscal Reporting

Accurate information is essential to CASAS so that we can make good business decisions, and externally so that customers, and the government can accurately assess the organization. This is why we require that all of the organization's books and records be fair, accurate, timely, complete, and understandable.

This requires that we maintain the integrity of our accounting and internal control system, that all transactions are valid, accurate, complete, and supportable, and that they are promptly recorded in the organization's books. All personnel are

responsible for using their best efforts to ensure that the organization meets these requirements.

Employee Responsibilities

Always be truthful in making any records or reports for the organization. This requires that all statements be truthful, complete, and never misleading or inappropriately suggestive.

- All records and reports of the organization must accurately reflect the truth of the underlying transaction or event. Never record false sales or shipments, understate or overstate known liabilities and assets, or defer recording items that should be shown as expenses.
- All financial records must conform both to generally accepted accounting principles and to the organization's systems of internal controls.
- Implement appropriate internal controls, including proper segregation of job duties, monitoring of business processes for unusual items or activities, and limiting and controlling access to organization resources.
- Report known or suspected fraudulent, illegal, or unethical activities, including for example, misapplication or theft of funds, impropriety with respect to reporting financial transactions, forgery or alteration of documents, misuse of confidential organization information.
- Only sign documents, including contracts, that you are authorized to sign and that you believe are accurate.
- Contact the CASAS Executive Team if there is any doubt about the appropriateness of document retention or destruction of records.

e. Fair Competition and Business Intelligence

We work to compete and succeed in a fair and honest marketplace. We do not engage in unethical, unfair, or illegal communications with competitors. We always deal fairly with customers, suppliers, competitors, and employees. We do not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation, or any other unfair-dealing practice. We do not enter into formal or informal agreements with competitors to engage in any anti-competitive behavior, including setting prices or dividing up customers.

Information about competitors is a valuable asset, but we strictly prohibit personnel from engaging in fraud, misrepresentation, or deception to obtain such information. Care should be taken when accepting information from third parties. You should know and trust their sources and be sure that the knowledge they provide is not protected by trade-secret laws or confidentiality agreements.

Employee Responsibilities

- Do not enter into any formal or informal arrangements, understandings or agreements with competitors which fix prices, allocate bids, and compare bids.
- Do not exchange sensitive information with competitors which might change the way the competitor behaves.
- Do not participate in any conversations with competitors that could be perceived as limiting competition.
- Obtain competitive information only through legal and ethical means; do not engage in fraud or misrepresentation in order to obtain information about competitors.
- Independently verify any claims by third parties that they obtained business intelligence properly.
- Respect the obligations of others, including current employees who were formerly employees of competitors, to keep sensitive information of their former employers' confidential.

f. Marketing and Sales Claims

The claims we make about our products must be truthful and accurate. All information we provide our customers about our products must be consistent and true.

Employee Responsibilities

- Represent our products and services fairly, truthfully, and accurately. Promote them only for their approved uses.
- Do not create by statement, or omission, any misleading impressions in any advertising, marketing, or sales materials, or in any presentations.
- Do not use messages or marketing materials that have not been properly reviewed and approved.

g. Commitment to Human Rights and Prevention of Unlawful Harassment and Discrimination

CASAS is committed to human rights and treating every stakeholder with dignity and respect. Key Commitments of CASAS Human Rights Policy include Ethical Business Conduct; Protection of Privacy; Safe Workplace; Right to Exercise Freedom of Association; Elimination of Child, Forced Labor and Human Trafficking; Equal Opportunity and Non-Discrimination and Fair Wages and Working Hours.

Equal Opportunity and Non-Discrimination

- CASAS supports the elimination of discriminatory practices with respect to employment.
- We are committed to the fair and respectful treatment of all employees.

- We are committed to and promote equal opportunity and diversity in the workplace and in all aspects of our business operations.
- We will provide employment and advancement opportunities to individuals based on merit, qualifications, and abilities, and will not tolerate acts of discrimination.
- Our policies prohibit discrimination based on race, color, age, gender, sexual orientation, marital status, gender identity and expression, ethnicity, religion, physical or mental disability, medical condition, genetic information, veteran status, national origin, as well as any protected class.

Safe Workplace

- CASAS maintains a healthy, safe, and productive work environment that seeks to foster a culture of care throughout our organization.
- We are committed to creating a work environment free from violence and harassment of any kind that threatens, intimidates, or coerces another person.

Anti-Harassment

CASAS strive to build and maintain a workplace that is professional and free from intimidation, harassment, and abuse. CASAS believes strongly in the respectful treatment of all people, and we have special responsibility with regard to our employees. Harassment for any reason and on any basis is prohibited. We will not tolerate harassing, bullying, or disruptive behavior. Any behavior that creates an intimidating, offensive, abusive or hostile workplace is prohibited at the organization. No employee is permitted to harass another employee concerning sex, pregnancy, childbirth or related medical conditions, race, religious creed, color, national origin, or ancestry, physical or mental disability, medical condition, marital status, age, sexual orientation, registered domestic partner status, gender identity or any other basis protected by federal, state, or local law or ordinance or regulation. CASAS will reasonably accommodate a qualified individual with a disability and persons with religious needs, in the manner provided by state and federal law. Please refer to the **CASAS Employee Handbook Exhibit B Prevention of Unlawful Harassment and Discrimination**.

Employee Responsibilities

- If you see or hear a co-worker behaving in an inappropriate manner, state your concern to the co-worker in a clear and respectful manner and/or report the incident to your manager/supervisor or the CASAS Executive team.
- Sexual, racial, or other offensives jokes or comments are not appropriate in the workplace, whether spoken or sent through email. Be aware of how your jokes or comments are received.
- Do not engage in communication denigrating a particular race, ethnicity, religion, sex, gender, gender identity, or other protected characteristic.

Anti-Discrimination

CASAS promote equality of opportunity and diversity within the workplace, recognizing and valuing the contributions that individuals make. We are committed to fair and respectful treatment and equal opportunity in our employment decisions. Our colleagues and job applicants are entitled to respect and should be judged only on the basis of their qualifications, skills demonstrated, and achievements. We believe that everyone deserves the opportunity to work in an environment that is free from illegal discrimination. We understand that diversity in our organization generates creativity and innovation. Discrimination on the basis of sex, race, creed, color, gender identity, sexual orientation, religion, marital status, age, national origin or ancestry, disability, medical condition, pregnancy, veteran status, citizenship status, or any other characteristic protected by applicable law is strictly prohibited.

Employee Responsibilities

- Treat others respectfully.
- If you manage others, or are involved in recruitment and hiring, review your own decisions to ensure that only objective merit and business considerations drive your actions.
- Expect others with whom you work, including outside of the organization, to act in a way that is consistent with our sense of fairness and equal opportunity.
- Report if you witness any co-workers who are not observing this policy.

h. Handling CASAS's Assets and Information

We all have an obligation to protect the CASAS's assets, including information, and ensure their efficient use. Organization assets and information should only be used for legitimate business purposes of the organization.

All personnel are responsible for using good judgment to ensure that our assets are not lost, stolen, misused, or wasted. Organization assets include, but are not limited to, business opportunities, financial resources, physical facilities and equipment, applications, intellectual property, confidential information, information of our customers and business partners, our files, and documents, as well as inventory, computer networks, and supplies. Due to data privacy and security concerns, you must especially be careful with portable electronics such as laptop computers and mobile devices.

Information created, accessed, transmitted, or stored using organization provided technology resources, such as email messages, computer files, telephone messages, or websites in your browsing history, are organization resources and assets. To the extent permitted by law, we may access, monitor, or inspect any organization resources, assets, and property at any time without prior approval, knowledge, or consent. This includes monitoring and retrieving information that is stored or transmitted on organization electronic devices, computer equipment, applications, and systems.

All CASAS employees, consultants, and contractors are bound by the **CASAS Human Resource Security, Policy, Confidentiality and Non-disclosure Agreements** and **Independent Contractor Agreement** (for contractor and consultants only).

Employee Responsibilities

- Use organizational assets, resources, and property only for legitimate business purposes.
- Report any suspicions you have regarding theft, embezzlement, misuse, or misappropriation of any organization property immediately.
- Limited personal use of organization provided information technology resources (i.e., your organization issued laptop and/or phone) is permitted as long as it has no adverse effect on productivity or the work environment.
- Other organizational assets, resources, and property are limited to business use (i.e., cameras, furniture, equipment, and the like).

i. Intellectual Property and Confidential Information

Our confidential and proprietary information is a valuable organizational asset. Except as required for the proper performance of your duties, you may not use or give to others trade secrets or confidential information of the organization without approval from the CASAS Executive team. Confidential information includes any information not known to outsiders. This includes prematurely disclosing information that would help competitors or be otherwise harmful to CASAS. Confidential organizational information includes but is not limited to any and all personally identifiable data subject to the provisions of FERPA, business plans, financial information, intellectual property, sales and profit figures, pricing, new product or marketing plans, research and development manuals, employee files and compensation data, and confidential information third parties have provided. All CASAS employees, consultants, and contractors are bound by the **CASAS Human Resource Security, Policy, Confidentiality and Non-disclosure Agreements** and **Independent Contractor Agreement** (for contractor and consultants only). Disclosure of any and all personally identifiable data is prohibited unless authorized by the Executive team. Each employee must protect confidential information. This means keeping information secure, limiting access to those who have a need to know said information, and avoiding discussion of confidential information in public areas. The obligation to preserve confidential information is ongoing and extends even after employment concludes.

Employee Responsibilities

- Use and disclose confidential information with proper approval.
- Do not leave confidential information unattended at fax machines or printers.

- Avoid discussing confidential information where others might be able to overhear.
- Store all confidential information using our designated information technology resources.
- Mark documents containing confidential information with a clear and conspicuous confidentiality statement.
- Secure confidential information when not in use – lock all computers and electronic devices.

j. Communications Outside the Organization

To ensure that the organization speaks with a clear, consistent voice when providing information to the public and media, only authorized persons may speak on behalf of CASAS.

Never give the impression that you are speaking on behalf of the organization in any communication that may become public if you are not specifically authorized to do so.

If you receive an inquiry regarding the organization's activities, financial results, business plans, or position on public issues and are not specifically authorized to respond, refer the request to CASAS executive team.

Engaging with the Media: Only the CASAS executive team may communicate with members of the media.

Social Media: In external interactions, employees should be mindful of whether they can be identified as affiliated with the organization and should consider how any statements related to work at CASAS may reflect on the organization. This is especially crucial in the context of social media where interactions are quick, dynamic, and may become highly visible. Careless communication can pose a significant risk to the reputation of CASAS. As a result, only designated people are permitted to post to social media on behalf of the organization.

Employee Responsibilities

- Do not give the appearance that you are speaking on behalf of the organization when using social media for personal use.
- Never share or post the organization's confidential information or the confidential information of our customers.
- Obtain approval prior to starting a new social media account on behalf of the organization
- If you are authorized to post on the organization's social media accounts, please follow the guidelines received social media training.

- If you see anything on social media that could potentially be of concern to the organization, please report to your manager/supervisor.

k. **Weapons Policy**

No weapons will be allowed at CASAS events, office locations, or in other spaces covered by the scope of this Code of Conduct. Weapons include but are not limited to guns, explosives (including fireworks), and knives, and other items used to cause injury or harm to others.

Anyone seen in possession of one of these items will be asked to leave immediately and will be subject to punitive action up to and including termination and involvement of law enforcement authorities. CASAS staff are further expected to comply with all state and local laws on this matter.

Responsibilities and Actions

i. **Reporting Potential Violations or Concerns**

Everyone is responsible for promptly reporting any violations of applicable law or regulations, this Code, as well as of any CASAS policies and procedures. Every effort will be made to maintain the confidentiality of reports about potential violations.

Options to report potential violations:

- If you are subject to or witness unacceptable behavior, or have any other concerns report to your manager/supervisor or directly to the CASAS Executive team within forty-eight (48) hours. Supervisors and managers/supervisors are required to report complaints or concerns about suspected ethical and legal violations in writing to the CASAS Executive Team.
- You may submit anonymous report via the third-party whistle blower site ALLVoices (<https://casas.allvoices.co>).

Everyone has an obligation to report violations. Not reporting a violation when you know about it may result in discipline up to and including termination of employment.

ii. **Preventing Retaliation**

In order to ensure legal compliance and build trust, we must listen openly to concerns that our personnel bring to our attention, respond appropriately, and must never retaliate against any individual in connection with an issue or concern raised in good faith.

We take claims of retaliation seriously. All such claims will be investigated and, if substantiated, retaliators will be disciplined up to and including termination. If you

believe you have been retaliated against, you should report such action immediately to the CASAS Executive team.

iii. Enforcement of the Code of Conduct

CASAS takes the obligation to investigate reports of potential violations of law, non-compliance with the Code of Conduct and organization policies, very seriously. CASAS is committed to impartially investigating all such reports where warranted, and in remediating any such violations in a fair and consistent manner.

iv. Cooperating with Investigations

- It is the policy of the organization to review, and if necessary, investigate all allegations of suspected or known violations of all applicable laws, regulations, this Code, and organization policy. It is the responsibility of every individual covered by this Code to fully cooperate with any investigation being carried out by or on behalf of the organization. Employees are expected to cooperate with investigations by:
- Promptly providing truthful accounts and relevant documentation and related information requests.
- Available for meetings with the individuals conducting the investigation.
- Maintaining the confidentiality of the investigation, including keeping confidential the existence of the investigation and any information transmitted during the course of the investigation, unless directed by legal authorities.
- Preserving all relevant documents and information pertaining to the investigation.

v. Disciplinary Action

Employees who violate this policy or fail to cooperate or otherwise impede an internal investigation may be subject to disciplinary action, up to and including termination of employment. By cooperating with investigations, you ensure that the CASAS continues to operate at the highest standards. Employees will not be retaliated against for full participation in an investigation.

Reference Documents:

1. CASAS Privacy Compliance Statement
2. CASAS Human Resource Security Policy
3. CASAS Confidentiality and Non-disclosure Agreements
4. CASAS Appropriate Use of Technology Resources
5. CASAS Independent Contractor Agreement (for contractors and consultants)