

“We only ever want the good” - Growing Good Money without Bad Money



Introduction.

Altum Strategy Group is a growing company with a reputation for delivering the next technology and business wave to clients. Our success today and in the future relies on providing value – growth, risk reduction, and return on investment - for our clients while simultaneously upholding the highest ethical standards.

The Altum Crew is passionate about Empowering people to deliver technology and business operations innovations in a manner consistent with our core values: Empowering others, Performance focus, thinking Boldly, active Engagement, inclusive Collaboration, and with Integrity.

At Altum, we use the concept of ‘Good Money versus Bad Money’ to describe potential sources of income for the company and spending by the company. We do not want Bad Money coming into the business or to be spending Bad Money at any time. An incident of Bad Money can undo the positive reputation we have built and continue to develop in an instant, negatively impacting our clients, business, crew members, and company value.

Good Money is earned by Altum when we perform work that empowers our clients with the next wave of technology and business innovations, creating value and opportunities for their businesses. It also means that we have collaborated and engaged as responsible stewards of our client’s businesses and our own.

To allow Altum’s foundation to be built on Good Money Crew members must comply with legal obligations, Altum’s policies, and also our client’s code of conduct. Doing so means the Altum Crew are responsible stewards of our business. Where a client has a conflicting standard from Altum policies, the policy differences should be raised with an Altum manager before continuing. An agreed approach should be decided upon and recorded. We all have a role in ensuring Altum is only associated with Good Money at all times.

As members of the Altum Crew, it’s up to all of us to constantly steer the company and manage its money with Integrity. Please find below the critical Altum behaviors and a decision guide that put our values into action and helps to ensure that at Altum, you are only involved in generating Good Money.



“At Altum Strategy Group our Clients, Partners and fellow Crew members are at the center of everything we do. We put people first as we enable the next wave of technology and business.

Growing Good Money, without Bad Money advises all stakeholders that how we grow and how we help them grow matters to us.

We are committed to our values of Empowering others, Performance focus, thinking Boldly, active Engagement, Inclusive collaboration and with Integrity. We put these in action every day.”

- Founder and CEO Matthew Gantner

with Integrity in Action

Good Money Practices.

1. Comply with laws

Comply with all laws, whether local, national, or regional. As a crew member, you are responsible for ensuring you are legally compliant. Failure to comply can impact Altum financially, cause imprisonment for criminal misconduct, loss of government contracting privileges, and damage relationships and reputation. Please also note:

- **Comply with all anti-corruption laws, including we do not give or accept bribes, including inappropriate gifts, meals, entertainment, and travel.** Before offering gifts, meals, entertainment, and travel to government officials, crew members must always gain legal and manager approval.
 1. We are consistent with Altum's gift, meals, entertainment, and travel policies.
 2. We carefully review Business intermediaries before entering into business with them. Altum only wants to work with contractors, subcontractors, and individuals that adhere to Altum's ethical standards. We understand that if they undertake unethical behavior, e.g., bribes, Altum can be held responsible.
 3. We comply with laws governing public officials' interactions, including lobbying, political contributions (money and in-kind), and campaign activity. Altum engages in policy discussion but does not engage in politics.
- **Do not engage in any money laundering or terrorist financing activities or assist any other party in doing so.** We identify any red flags for further investigation and report suspicious activity to the government where required. If we see something, then we say something. Please raise any red flags with your manager or a trusted crew member.
- **We compete fairly at Altum.** We only want to win business based on our merits and values and will not engage in unfair competition. We do not collaborate with competitors on how to price our services or whether to pursue opportunities. We do not share or accept confidential information with/from competitors or misuse others' confidential information, including former employers.
- **Obtain necessary approvals to provide services to government clients and comply with government contracting and procurement regulations.** Crew members who wish to engage a government client with our services must speak with an experienced government services team member and legal before pursuing opportunities. Governments have specific legal requirements and restrictions for bidding, pricing, and delivering services. Failure to comply with these requirements can put Altum at legal risk.



- **Comply with international trade controls.** At Altum, we comply with all applicable international trade controls, whether economic sanctions, trade sanctions, export controls, or individual sanctions.

This includes legal requirements like government licensing on the international transfer of certain goods such as technology and services. International trade controls constantly change with world dynamics, and it's Altum's responsibility to understand the policies at all times. Crew members should check with their manager and legal when considering international licensing, business opportunities, and the provision of goods and services.



2. Deliver the next wave for our clients

Altum delivers impactful outcomes at the highest level of professional standards. We continuously focus on creating value for our clients today, enabling them to capture opportunities in the future. We want our clients to thrive by accessing innovative technology and business solutions tailored to their needs. The Altum crew enables this by putting into action our core values: In addition to being performance focused and thinking boldly, the crew is empowering others through active engagement, inclusive collaboration, and with integrity. At Altum, we put people first and always deliver on our commitments.

- **Think Boldly, focusing on value and outcomes.** Altum's performance focus with integrity drives our innovative technology and business solutions for clients, ensuring that value is delivered and results attained when they capture the next wave. This sometimes means reframing the client's challenge and offering new and tailored solutions than the client has in mind. We do this as we want long-term relationships with clients where they see value in everything we do.
- **Put people first. Altum's client solutions methodology, the Altum Wave, and how we work puts people first.** We do that through active Engagement and inclusive Collaboration, allowing us to Empower others. This helps us maintain the highest professional standards and creates maximum value for our clients. Part of putting people first is ensuring clients have access to Altum's leaders and experts they need to inform, help decision-making, think boldly and understand the next technology and business wave.
- **Deliver on our commitments.** Altum crew members should only commit to clients what we can provide and consistently deliver on our contractual obligations. Crew members must obtain approvals for new lines of business and geographies before offering new innovative technology to clients. Confidentiality is essential to Altum and our client's businesses. At Altum, we never share confidential information about our clients with others. We are careful with confidential information that clients share and manage it with integrity. Altum crew members must not tell others to buy and sell securities off the basis of the information they receive from clients at any stage. A breach of confidentiality is a breach of trust; we take that seriously at Altum. Any crew members sharing client confidential information with others will result in disciplinary action.

3. Be responsible stewards of the business

Altum Crew members are thought leaders with an owners mindset. Together we recognize our responsibility and commitment to our clients and Altum. We care about the company's future, clients, and crew members. While acting with an owner's mindset, Altum crew members also understand their limited individual authority depending on their duties. When a situation arises that needs a more senior level or expert review, Altum crew members seek it.

- **Treat Altum's business with an owner's mindset.** Crew members have an owner's mindset ensuring financial obligations (pricing, cost management, and expenses), company values, legal obligations, and ethical standards are always maintained. We are conscious that bad money can arise with great clients because our project cost assumptions are incorrect, and we have not followed our values or maintained ethical standards. It's our responsibility to attract good money.
- **Identify if you have a personal conflict of interest.** We want to know that individual interests and relationships do not create a conflict for Altum. Crew members owe a duty to Altum to advance its business interests, and conflicts of interest can interfere with your judgment and obligations to Altum. Remember, conflicts can be actual, potential, or perceived; in each case, it's best to declare them to your manager so appropriate steps can be taken.
- **Accurately report time and expenses, and vacation hours.** We submit accurate times worked, vacation days taken, and legitimate business expenses within the appropriate timeframe. We never ask those under our supervision to report hours worked or expenses inaccurately. From time to time, Altum will verify the time reported and expenses claimed, which also may be requested by our clients. All expenses must comply with Altum's and our clients, where relevant, expense policy. Appropriate time and expense management can strengthen our relationship with clients and allows us to act as the Altum business's stewards.
- **Use data and new technology responsibly, including when we deploy artificial intelligence.** Enabling new technologies often involves the handling of data. We take responsibility for securing clients' data seriously and follow legal requirements and company policies. Likewise, we implement new technologies responsibly, including artificial intelligence. We take responsibility for deploying our clients' technology systems, putting people first, and ensuring those systems are high performing. When artificial intelligence is used, we strive to make the decision steps fair and based on sound judgment.
- **Purchase goods and services based on their merits.** Crew members must ask supplier personnel who provide services to Altum and our clients follow engagement, compliance, and exit requirements and procedures.
- **Empower others by supporting and respecting human rights.** Altum's core value of empowering others reflects our approach to human rights. Altum supports and respects human rights as expressed in the International Bill of Human Rights and the International Labor Organisation's Declaration on Fundamental Principles and Rights at Work. We raise any concerns we have regarding human rights with Altum leaders and take action. Our commitment to human rights encompasses diversity and equal opportunity, employment conditions and working practices, health safety and security for our crew members, responsible supply chain practices, data privacy, and anti-corruption.

- **Enable sustainable growth performance and environmental stewardship.** With integrity, we promote environmental sustainability and sustainable economic growth for our company and stakeholders. We strive to minimize adverse environmental impacts. In our strategic operations, we drive economic sustainability by running efficient operations and reducing our risks. Every crew member has a role in achieving economic sustainability for Altum. Crew members must also focus on our clients' sustainability through the projects we deploy together while at the same time seeking sustainable solutions from our suppliers. Enabling sustainable growth and return on investment for clients while decreasing their risks.



Integrity in Action

If you are concerned about the potential for Bad Money appearing at Altum, please immediately raise this with your manager or HR. This includes even if you believe a potential risk hasn't occurred yet. After reporting the situation, if that person fails to act appropriately, you may raise with a trusted internal advisor, HR, or the next-level manager at Altum. At Altum, we have zero tolerance for retaliation, so this should not prevent you from further raising a situation you are concerned about.

Below we have provided a decision-making tool for situations that may arise at Altum that still need to be covered in policies, this code, your contract, or other onboarding materials. Sometimes situations that arise don't have a clear path to resolution. It can guide you on an approach; remember to involve others in the Altum crew to help you make the final decision, such as your Altum leader, Legal, Communications, or HR.



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