

# COMPASS

## EMPLOYEE & DIRECTOR CODE OF ETHICS

### PURPOSE

**Integrity, professionalism and respect are the cornerstone of our business. In all that we do, Compass and its majority owned subsidiaries (the “*Company*”) strive to support and uphold these values and principles. The Company’s reputation and the success of our business depend on each of us understanding and demonstrating our commitment to the highest standards of ethical business conduct when working with each other, and in how we do business with others.**

**In the course of our work, we might face a situation where the right response is not obvious.** This Code of Ethics (the “*Code*”) is intended to serve as a guide to help us answer potential legal and ethical questions that may arise. However, no policy can address or anticipate every situation we might face. If you have a question about any course of conduct, you should consult your direct manager, People & Culture (“*P&C*”), or a member of our Legal Department before proceeding.

### A MESSAGE FROM ROBERT REFFKIN

At Compass, our mission is to help everyone find their place in the world. As Company employees, officers, and members of the Board of Directors, we also have an obligation to help each other find our own places here at Compass or one of its majority owned subsidiaries.

One way that we can embrace these responsibilities is to focus on investing in and protecting our culture. It differentiates us from other companies and is one of the most important contributors to our success. It is in large part because of our culture that we are able to hire and retain great professionals, deliver an industry leading platform and unparalleled client service, and in turn, cultivate a loyal and successful agent base.

We are all responsible for maintaining the Company’s culture and values as we grow. By conducting ourselves with integrity and dignity and in accordance with legal guardrails, we preserve, protect and enhance our culture and reputation.

This Code provides a roadmap for how we act and make decisions. I expect everyone – Board members and leaders as well as the rest of our employees – to follow its guidance and to encourage others to do the same.

If you have concerns about potential violations of this Code, we want to hear from you. Please feel empowered to report concerns to your manager, P&C, or our Legal Department. You can also report a concern anonymously 24 hours a day, 7 days a week, by reaching out to Syntrio Lighthouse online, at 833-452-3111 or at [reports@lighthouse-services.com](mailto:reports@lighthouse-services.com).

Thank you for helping promote and maintain our Company’s culture.

## PERSONS COVERED BY THE CODE

This Code applies to all employees of Compass Inc., including those of its controlled subsidiaries and entities in which the Company owns a majority interest (a “Subsidiary”), as well as its officers and members of our Board of Directors (“**Board**”). Agents, other independent contractors, and vendors are expected to comply with the Vendor Code of Ethics.

All covered persons must acknowledge that they have read and agree to uphold the Code at the commencement of their employment or tenure as a member of the Board of Directors and on a regular basis thereafter.

Employees who violate the Code may be subject to disciplinary action up to and including termination of employment. Disciplinary action may also include reduced or denied bonuses or other compensation as set forth in Compass incentive and compensation plans and in accordance with applicable law.

## OUR EXPECTATIONS

We expect that all persons covered by this Code will:

- Read and act in accordance with the Code;
- Use good judgment;
- Follow the law;
- Seek help when an answer is unclear;
- Stay vigilant with regard to potential Code violations; and
- Report concerns.

**Managers:** Managers play a key role in creating and maintaining a speak up culture. As managers, you should strive to create a working environment where employees feel comfortable reporting concerns and where you act swiftly upon them. As representatives of the Company, you also

have a greater obligation to look out for and report misconduct.

## YOUR RIGHTS AS AN EMPLOYEE

While we expect you to follow our Code, we also recognize your rights as a Company employee. For example, you have the right to speak publicly about matters of public concern or to participate in certain activities related to the terms and conditions of your employment. Nothing in this Code or in any Company policy is intended to limit or interfere with your rights under the law, including but not limited to those rights under Section 7 (29 U.S.C. 157) of the National Labor Relations Act.

## MAKING THE RIGHT DECISION

In evaluating your conduct, it is helpful to ask the following questions:

- Purpose
  - Why am I doing this?
  - Is it consistent with the Code?
  - Is it legal?
  - Even if it is legal, is it the right thing to do?
  - Does it follow our policies?
  - Does it benefit the Company as a whole? Not just a certain group or stakeholders?
- Process
  - Did I follow the right steps?
  - Did I consult the right experts or stakeholders?
- Perception
  - How would this look to our customers, regulators, employees or the media?
  - How would this look three or four years in the future?

If you are ever in an uncomfortable situation or have any doubt about whether a situation is consistent with our ethical standards or complies with the law, please seek help from your direct manager, P&C, or the Company's Legal Department. You can also report a concern anonymously 24 hours a day, 7 days a week, by reaching out to Syntrio Connects Standard online, at 833-452-3111 or at [reports@lighthouse-services.com](mailto:reports@lighthouse-services.com).

## HONEST AND ETHICAL CONDUCT

The Company expects each of us to strive for excellence and work with integrity in all that we do. It is unacceptable to cut ethical or legal corners for any reason. In this section, we will discuss some situations that we may face.

### *Conflicts of Interest*

We must all act in the best interests of the Company, and avoid engaging in or giving the appearance of engaging in conflicts of interest. Generally, conflicts of interest are situations that divide your loyalty between the Company, on the one hand, and your own personal interests, on the other. Conflicts of interest can be actual or potential areas for concern. They can also be perceived, meaning, there is an appearance of a conflict even if one doesn't actually exist. When we refer to conflicts in the Code, we are contemplating all of these scenarios.

Determining whether a conflict of interest exists is not always easy to do. Before engaging in any activity, transaction, or relationship that might give rise to a conflict of interest, you must first notify and seek written approval from your direct manager, P&C, and the Company's Legal Counsel. For more information, please visit the P&C Help Center or contact your P&C Business Partner. If you are a Board member, you must first notify and seek written approval

from the Chair of the Audit Committee of the Board ("***Audit Committee***").

In the following sections, we provide examples of situations that could present a conflict of interest.

### *Outside Employment or Consulting*

You may not engage in any outside employment or consulting that would interfere with your job performance or responsibilities. In addition, if a close family member or significant other is working or consulting for a competitor, that could be a potential conflict.

### *Personal Relationships*

Hiring or supervising a family member or others with whom you have a close, personal relationship may be a conflict. Moreover, being in a personal relationship (e.g., dating, living together, etc.) with another employee, applicant, or contractor can create a conflict of interest if that relationship might affect your judgment, or appear to impact your judgment. For additional information on this topic, please refer to our Conflicts of Interest policy in our Employee Handbook.

### *Business with Related Parties*

You should avoid awarding Company business to, or doing business with, a relative or significant other, individually or through a company they may be associated with. To prevent a conflict of interest, employees directing business to or from the Company to a related party should first discuss the situation with their manager and remove themselves from the decision-making process.

Even if a related-party transaction appears to be in the Company's best interests, you must first fully disclose the transaction to the Company's Legal Counsel, and receive approval from our Nominating and

Corporate Governance Committee, before engaging in that transaction.

### *Outside Advisory or Board Service*

Serving on advisory boards or boards of directors, or being appointed to industry groups, may present actual or potential conflicts. Officers and employees who wish to serve on an advisory board or board of directors must seek approval from their direct manager, P&C, and the Company's General Counsel. Members of the Board of Compass, Inc. must follow the process set out in our Corporate Governance Guidelines.

### *Investments and Business Interests*

If you, a relative, or a member of your household are considering investing in one of our suppliers, vendors, business partners or competitors, take great care to ensure that the investment does not compromise your obligations as our employee. As a general rule, you should avoid making direct personal investments in competitors or business partners when such an investment might cause or appear to cause you to act in a way that could be harmful to the Company.

Things to consider in determining whether there is a real or seeming conflict:

- The size and nature of your investment,
- Your ability to influence the Company's decision,
- Your access to our confidential information, and
- The nature of the relationship between us and the other company.

Generally, investment in venture capital or similar funds that invest in a broad array of companies that may include a Company competitor or business partners do not create

a conflict of interest unless you control the fund's investment activity.

### *Corporate Opportunities*

You may not take advantage of any opportunities discovered through your job with the Company for personal gain, or for the personal gain of a close friend, relative or significant other. These opportunities include, among others, the Company's sales and other business development opportunities, inventing products or services, and writing books.

### *Meals, Gifts, and Entertainment*

Building strong relationships and socializing with customers, vendors, business partners, and suppliers is an integral part of establishing important business relationships. However, good judgment should be exercised in providing business meals and entertainment or inexpensive gifts, so that all such conduct is consistent with customary and prudent business practices.

You should never give meals, gifts or entertainment unless they are reasonable, customary, and for an appropriate business purpose. You may never use personal funds or resources to do something that cannot be done with Company resources. Always be mindful that other organizations have their own rules on receiving gifts. You should never offer a gift that would violate those rules and put a business partner in a potentially uncomfortable position.

You should also avoid any actions that create a perception that the Company sought or received favorable treatment from other entities or people in exchange for business courtesies such as gifts, gratuities, meals, refreshments, entertainment or other benefits. For additional information, please refer to our Travel and Entertainment Expense Reimbursement Policy.

Likewise, you should not solicit or request any gift. Gifts may be accepted if they are infrequent, unsolicited, are of nominal value, and will not influence your judgment. Generally, acceptance of inexpensive non-cash gifts is permissible, as are infrequent and moderately priced meals and entertainment. Consider the following examples:

Acceptable Gift	Unacceptable Gift
A casual lunch at a local restaurant with a vendor	An extravagant meal for you and your friends sponsored by the vendor who does not attend
A gift bag from a business partner's conference filled with small snacks and toiletries	A holiday gift basket from a business partner filled with ipads and other expensive electronics
An invitation to play at a local golf course with a customer	Plane tickets and hotel accommodations at a luxury private course
A tee shirt with a vendor's logo on it	A luxury designer sweater

If you have questions about whether to accept a gift, discuss it with your direct manager, P&C, or Company Legal Counsel

### *Loans*

Under SEC rules, we are not allowed to provide loans (or guarantee loans) to our executive officers, members of our Board or their families members. Loans to employees, contractors and vendors are almost never made except in the context of routine expense reimbursement situations. Any

loans outside of those related to routine expense reimbursement situations must be approved by the Company's General Counsel and if appropriate based on the General Counsel's advice, the Board of Directors..

## **COMPLYING WITH THE LAW**

We are subject to numerous federal, state, local and international laws, rules, and regulations. Employees, officers and directors must respect and comply with all laws, rules and regulations, as well as Company policies and guidelines. Areas of particular significance are discussed in greater detail below.

### *Insider Trading*

We believe firmly in transparency and trust across the organization, and as such you may find yourself in possession of material nonpublic information about Compass or our customers, partners or other third parties. "Material information" is information that a reasonable stockholder would consider important in making a decision to purchase, hold or sell stock in a company. Material information can be positive or negative and can relate to virtually any aspect of a company's business. It is important that we treat material nonpublic information with the same care that we treat our own personal information. For guidance about this, please see the section on *Confidentiality*, below.

The bottom line is that we **never** buy or sell securities based on material nonpublic information, nor do we tip off others to do so. It doesn't matter how we learned the information - using material nonpublic information to trade securities is never acceptable. Doing so **violates the law** and the trust we have built with our fellow employees, our customers, partners, investors, and others.

Employees are allowed to trade in Company stock only during an open Trading Window (as further explained in our Insider Trading Policy). However, even during open Trading Windows, you are not allowed to trade in securities while in possession of material nonpublic information. Some employees may be subject to periods when they may not trade the Company's stock (i.e., "blackout periods"), because they are in possession of material nonpublic information about the Company towards the end of a quarter or year, or because they have other material nonpublic information about the Company. Employees that are subject to trading restrictions will be apprised in advance. Employees who are subject to trading restrictions are expected to refrain from trading Company stock while the restrictions are in place.

For more information about this subject, please refer to our Insider Trading Policy.

### *No Bribery or Corruption*

All forms of bribery and corruption are prohibited. We will not tolerate bribery or corruption in any form or for any purpose. Be mindful that bribery comes in many forms that are not always obvious. If offered in exchange for a decision or favorable treatment, all of the following could be considered bribes: gifts, the promise of a job, an offer to fund a vacation, or a charitable contribution.

There is no potential benefit that can justify damaging our integrity and reputation or the trust others place in us.

Without limiting the above, all persons subject to this Code must also comply with all laws that prohibit bribery and corruption, such as the Foreign Corrupt Practices Act (FCPA). Many of these laws are very broad and apply to both government and private or commercial bribery and corruption. Without limiting the foregoing, under no

circumstance may a payment be made by the Company to any government official for the purpose of influencing any of the official's acts or decisions or for the purpose of inducing the official to use their personal influence to impact any government act or decision (for example, a payment to expedite the processing of a permit or license application). For purposes of this policy a "government official" includes any officer, employee, or other agent acting on behalf of a government or governmental unit.

You are responsible for ensuring that you understand the applicable laws and our Anti-Bribery/Anti-Corruption Policy.

If you have a question regarding any payment - whether a gift, entertainment or other expense - may violate our anti-corruption policy, please consult with the Company's Legal Counsel before you incur or authorize the payment.

### *RESPA and Related State Laws*

The Real Estate Settlement Procedures Act ("RESPA") is a federal statute which provides consumers with improved disclosures of settlement costs and seeks to eliminate certain referral fees and kickbacks. State laws often have similar and sometimes stronger prohibitions than RESPA.

RESPA and related state laws generally prohibit giving or accepting any "thing of value" in exchange for the referral of settlement services business. Settlement services business generally includes, but is not limited to, real estate brokerage services, mortgage loan origination, title insurance, escrow and closing services, property surveys & appraisals, credit reports, pest and fungus inspections, and home warranty companies.

As a result, providing things of value, such as cash, incentives, meals, gifts, prizes,



tickets to events, or more favorable commission splits to real estate agents (and others), as an inducement or reward for referrals of settlement services business, is generally prohibited.

There are some limited exceptions to RESPA, including certain payments from employers to employees. However, you should generally assume that RESPA and state law prohibitions on kickbacks and inducements are applicable. Violations of RESPA can result in regulatory actions, hefty fines, license suspension/revocation, class action lawsuits and even criminal penalties, so compliance with RESPA and related state laws is very important and Company policy.

If you have a question regarding whether any payment or other kickback or inducement may violate our Anti-Bribery/Anti-Corruption Policy, please consult with the Company's Legal Counsel before you incur or authorize the payment.

### *Money-laundering and Third-party Payments*

We are committed to complying fully with all applicable anti money-laundering and antiterrorism laws throughout the world. Money laundering occurs when individuals or organizations attempt to conceal illicit funds or make such funds look legitimate. If you are requesting payments to vendors or potential vendors, or are monitoring payments we receive, you must flag suspicious activity. The following examples may be indications of potential money laundering:

- Attempts to make unusual, large cash payments,
- Payments by or to someone who is not a party to the relevant contract,

- Requests to pay more than provided for in the contract,
- Payments made in currencies other than those specified in the contract, and
- Payments from an unusual, non-business account.

For more information about this area, please refer to the Company's Anti-Money Laundering Policy and Procedures Manual, or contact a member of the Legal Department.

### *Unlawfully Obtaining Business Intelligence*

Gathering information about our competitors, often called competitive intelligence, is a legitimate business practice. It helps us stay competitive. However, we must always obtain business intelligence appropriately from legitimate sources. You must not steal competitive intelligence, or obtain it from someone else who is not permitted to share it with you because of their confidentiality obligations. In addition, when gathering competitive intelligence, you should never try to misrepresent your identity or who you work for. These rules also apply to consultants, vendors and other business partners we retain, so we should not ask them to do the things that we ourselves may not do.

### *Fair Sales and Marketing Practices*

We compete vigorously for business based on the merits of our offerings, products and services. We do not participate in any activities that unfairly harm competition. That is, we believe in competing fairly.

We will accurately represent the Company and our offerings, products and services in our marketing, advertising and sales materials. We can promote our offerings,

products and services and make accurate comparisons between us and our competitors.

We should not make deliberately misleading statements, leave out important facts, or make false claims about our offerings, products and services, or our competitors' offerings, products and services.

Antitrust laws govern relationships between a company and its competitors. Collusion among competitors is illegal and the consequences of a violation are severe. We must never enter into an illegal or collusive agreement or understanding of any kind with competitors concerning commission splits, incentives, discounts or other terms or conditions of agreements with agents; profits, margins or costs; allocation of products, services, customers, markets or territories; or boycotts of customers or suppliers. In addition, we may not even discuss or exchange information with our competitors about these subjects in a manner that would be considered or perceived as collusion.

### ***Selecting Suppliers***

To achieve our mission, we need suppliers that are as committed as we are to building trust, that will do great work, and that will follow the law. We select the best suppliers for the job, by carefully considering their proven track record, reputation for integrity, and other merits -- not based on favoritism. We will not tolerate child labor, human trafficking, and other labor abuses in our supply chain. You should confer with our Procurement Department for new supplier selection and onboarding. Procurement will coordinate with all the required stakeholders (e.g., Legal, Information Security, Accounting, etc.) to ensure compliance with Company procedures regarding third-party governance.

## **RESPECTING HUMAN RIGHTS**

We are committed to respecting human rights, including under Fair Housing laws, to ensure that our business plays a positive role in the communities in which we operate. We do not permit any activities which violate human rights, including but not limited to the use of forced labor and human trafficking. We expect employees, partners, suppliers, customers, and governments to share this commitment.

## **FINANCIAL MATTERS AND BUSINESS PRACTICES**

You are expected to act responsibly and exercise sound judgment with respect to our finances and financial reporting. Investors rely on accurate and complete financial and business information to understand the Company's performance and to make informed decisions. You may execute financial transactions only with authorization and in compliance with our policies. You also are expected to record and report all financial transactions and business information accurately and completely, to comply with our system of internal controls, and to follow applicable laws, regulations, and accounting practices.

We regularly file reports and other documents with regulatory authorities, including the U.S. Securities and Exchange Commission ("**SEC**"). In addition, we may make other public communications, such as press releases, from time to time.

We are all responsible for ensuring the Company's financial integrity and fiscal responsibility. Depending upon your position with the Company, you may be called upon to provide information to help ensure that our public reports and communications are timely, complete, fair, accurate, and understandable. Employees involved in preparing public reports and communications must use all reasonable



efforts to comply with these principles and any applicable disclosure controls and procedures.

Regardless of your involvement in these reports and/or communications, if you believe that any disclosure the Company has made is materially misleading or if you become aware of any information that could have a material impact on the Company's financial statements or disclosures or that you believe should otherwise be disclosed to the public, it is your responsibility to report the matter to the Legal Department or through the compliance hotline. In addition, if you believe that questionable accounting or auditing conduct or practices have occurred or are occurring, you should also report the matter to the Legal Department or compliance hotline.

### ***SEC Reporting and Financial Statement Preparation***

Our periodic reports and other documents filed with the SEC, including all financial statements or other financial information, must comply with applicable federal securities laws and rules. We all have an obligation to ensure that our books, records and accounts are accurately and completely maintained and to cooperate fully with our Finance Department, as well as our independent auditors and counsel. If you are involved in the preparation of our SEC reports or financial statements, you must specifically:

- be familiar with and comply with our disclosure controls and procedures and our internal controls over financial reporting, and
- take all necessary steps to ensure that all filings with the SEC and all other public communications about our financial and business condition provide full, fair, accurate, timely and understandable disclosure.

### ***Quarterly Compliance Certifications***

Depending on your position with the Company, you may be asked to certify your knowledge of various facts. We rely on certifications to record transactions, make legal and accounting determinations and comply with laws. If you are asked to provide a certification, we expect that it will be fair, accurate and completed timely in accordance with internal deadlines.

### ***Business Expenses***

You are expected to incur business expenses wisely. When you submit an expense for reimbursement or spend money on our behalf, you must make sure that the cost is reasonable, directly related to our business or a specifically authorized benefit, supported by appropriate documentation and in compliance with our policies. Always submit expense reports in a timely manner, record the purpose and relevant details and comply with all submission requirements. For more information about business expenses, please consult the Company Travel and Entertainment Expense Reimbursement Policy. If you are uncertain about whether you should spend money or submit an expense for reimbursement, check with your direct manager. Direct managers are responsible for all money spent and expenses incurred by their employees and should carefully review such expenses and supporting receipts before approving.

### **USING AND PROTECTING OUR ASSETS, SYSTEMS AND FACILITIES**

#### ***Access to Our Offices***

Company offices are made available to employees, customers, and their visitors having authorized, legitimate business purposes.

## *Computers and Other Equipment*

We must all care for any equipment provided to us by the Company (such as laptops) and use it responsibly for business purposes. You may make limited personal use of our equipment, provided such use does not interfere with our business or violate any law or Company policy. If you use any Company equipment at a location outside of our offices, you need to take precautions to protect the equipment from loss, theft or damage. All Company equipment must be fully accessible to us and remains our property, even while in your possession. You have no right to privacy in our equipment (including laptop computers provided to you) or to any personal information stored on that equipment. You may not use your own personal laptop or computer for Company work without permission from your direct manager and our IT Department, and may only do so in compliance with all policies relating to the use of such equipment.

## *Software and Content*

All software that you use in your work for the Company must be appropriately licensed and approved. Any non-licensed software should be removed from Company issued devices. It is against our policy to make, use or share illegal or unauthorized copies of software or other copyrighted material.

If you use open-source software, you should be sure that you are using it in accordance with any license terms, and are not disclosing any confidential Company information in the process.

## *Retaining Records*

Our records and information are important assets that comprise our corporate memory and contain information critical to the continuity of our business. Accurate recordkeeping also helps us meet our legal

and regulatory requirements. These records include not only paper records, but electronic records, such as e-mail, messaging apps and computer drives. You must manage and retain records for as long as needed, consistent with our business and legal obligations, and dispose of them when they are no longer needed.

Please be especially cautious with records and information that are subject to a “legal hold,” which may be imposed under certain circumstances such as litigation or government investigations. When there is a “legal hold” in place, you will be apprised. If you are sent a “legal hold,” you may not alter, destroy or discard documents relevant to the lawsuit, legal proceeding or investigation, even if they are past their standard retention period.

## *Protecting Information and Intellectual Property (IP)*

The innovations you create every day are vital to our success. We expect you to understand the value of these innovations and to take appropriate steps to protect them. This means disclosing to the Company all inventions and other IP created or improved as part of your work for us, assisting with the preparation and prosecution of patent or trademark applications, protecting confidential information and avoiding the improper use of third-party confidential information or IP. You are also expected to comply with any agreements that you have with the Company concerning intellectual property, including but not limited to the Proprietary Information, Invention, and Arbitration Agreement that you signed at the time you commenced your employment with the Company.

## *Disclosing Confidential Information About the Company and Others*

As a Company employee, you have an obligation to keep information related to the

Company confidential. You should not discuss sensitive matters or confidential information with any third party that has not signed a non-disclosure agreement (“*NDA*”) with the Company. In addition, you should only share such information with employees who have a need-to-know to perform their job responsibilities. We should be especially careful that we are not overheard when we are talking on our mobile devices, and that confidential information on our laptops is not in plain view in public places.

Confidential materials in our offices should be secured so that individuals not having a need to know cannot access them. Also, if confidential information is written on a white board in a conference room, it should be erased when the meeting is over.

As explained above, if you need to disclose Company confidential information to a third party (such as a vendor or business partner), you must have the parties execute an NDA prior to sharing any confidential information. You should also limit any disclosure to information that the third party requires to fulfill the business purpose, as it is defined in the NDA. For NDA templates and other information, please consult the NDA resource page on the Navigation Center. All non-Company NDA forms, and any changes requested by a third party to a Company NDA form, must be reviewed and approved by the Legal Department.

If a third party has disclosed confidential information to you or the Company under an NDA, we must comply with the terms of the NDA and limit our use of the confidential information to the specific purpose for which it was intended.

You should never attempt to obtain a competitor’s confidential information improperly. This includes asking another employee to disclose confidential

information they received while working at another company.

If you obtain another company’s confidential information accidentally or from an unknown source, it may be unethical or even illegal to use the information. You should immediately contact the Legal Department to determine how to proceed.

### *Data Privacy and Security*

We understand and respect the importance of privacy. Trust is the foundation of our business. We value the confidence our customers, employees, clients and others have in us and take the responsibility of protecting their information seriously. To be worthy of their trust, we built and will continue to grow the Company with an emphasis on privacy and security. We should collect, hold, and use information only that is necessary for legitimate business purposes. We also endeavor to prevent the unauthorized access, use and disclosure of information.

To that end, we should follow all recommended security procedures, including those made available on the Navigation Center. For example, when accessing non-public Compass data and technology, you should use an approved Compass managed device; if accessing with a personal device, you must keep your devices secure and the software up to date; use robust passwords and keep them confidential; when sending sensitive information, follow our data classification policy and verify the person you are sending it to; when possible, send the information in an encrypted file; do not open attachments or click on links from unknown or suspicious sources; and keep your documents backed to your Google Drive.

If you are aware of a data breach, or if you suspect that a data breach may have possibly occurred, you must report it immediately to [security@compass.com](mailto:security@compass.com).

### *Requests by Regulatory Authorities*

Stewardship of the data we receive from others, including customers, employees, and suppliers, is a responsibility we embrace. All government requests for our information, documents or interviews of our employees should be referred to the Legal Department immediately. This Code is not intended to prevent you from confidentially providing information to a government or law enforcement agency if you reasonably believe that the information discloses a legal violation by us or our agents.

## **COMMUNICATING WITH OTHERS**

We are committed to providing accurate, timely and clear disclosure in our public communications. Because any external communications can affect our business, you must be thoughtful and conscientious about what you say and write in public. Only people who have been specifically authorized may speak on behalf of the Company without prior approval. If you are approached by anyone such as a member of the press, analyst, or current or potential investor of the Company, please refer the individual to our Public Relations team by emailing [press@compass.com](mailto:press@compass.com). When posting online in your personal capacity, care must be taken that viewers do not perceive you to be holding yourself out as a Company representative. For additional information on communications, including our Social Media policy, please refer to our Workplace Communication Policy in our Employee Handbook.

## **A PLACE WHERE WE CAN ALL DO OUR BEST WORK**

### *Diversity, Inclusion, and Belonging*

Our business is driven by our mission to help everyone find their place in the world and that includes understanding and celebrating that each one of us brings a unique life experience and perspective to work. Creating a culture that fosters inclusion and belonging is core to who we are, and it's also smart business: diverse companies are more creative and drive stronger results. We're committed to infusing diversity, inclusion and belonging throughout our culture, and ensuring equity in our systems and people practices.

As part of these principles, we act as a team that embraces different perspectives, seeks innovation from everywhere, and enables our colleagues, our customers and our communities to change the world. We value groundbreaking thinking and new ways of approaching problems. For more information on this subject, please refer to the Company's statement on Diversity, Inclusion and Belonging.

### *Fair Employment Practices*

We are committed to providing equal employment opportunities for all applicants and employees. We do not unlawfully discriminate in employment practices on the basis of any protected class. Employment practices include all aspects of employment, such as hiring, job assignment, performance management, promotion, compensation, benefits, discipline, and termination. Protected characteristics include race, color, ethnicity, religion, sex, sexual orientation, gender identity or expression, transgender status, genetics, marital or veteran status, age, national origin, ancestry, physical or mental disability, medical condition, pregnancy or childbirth, or any other characteristic protected by law.

Additionally, every employee, agent, independent contractor, vendor, and others who we do business with have a right to a work environment free from unlawful harassment. Harassment can include any behavior (verbal, visual or physical) that creates an intimidating, offensive, abusive or hostile work environment. It can also include requests for sexual favors, sexually explicit language or jokes, or showing sexually explicit pictures. We do not tolerate harassment of any kind.

If you witness or experience discrimination or harassment, you should report it immediately. You may report the matter by contacting your direct manager, P&C, or the Legal Department. You may also report the matter to the Company's compliance hotline. Reports to the compliance hotline can be made anonymously. For information on reporting matters through the hotline, please refer to the section on *Reporting Concerns*, below. Managers should not attempt to investigate matters on their own -- they are required to report the matter to P&C, the Legal Department, or the hotline.

We will promptly review reports of discrimination or harassment, and we will take corrective action as necessary and appropriate.

We will not retaliate against any employee for bringing a complaint in good faith or participating in any investigation in good faith and we will not tolerate retaliation by others. You should report any concerns about retaliation immediately.

### *Safety and Security*

We expect everyone to treat others fairly and with dignity and respect. We promote and provide a professional work environment, free of threats and violence. We are committed to the safety and security of our customers, employees, independent contractors, and others who we do business

with, and their property. We will not tolerate bullying, threats of violence, acts of aggression, intimidation, or hostility. You may not possess firearms, other weapons, explosive devices, or dangerous substances or materials in the workplace. Any potentially dangerous situation must be reported immediately.

We promote a drug-free workplace. We may not use, be under the influence of, or possess illegal drugs at work. In addition, we must not work while under the influence of alcohol.

### *Cooperating with Investigations*

We will conduct prompt, thorough, and fair investigations of alleged or actual violations of our policies, procedures and laws, rules, and regulations. All employees are required to cooperate with any Company investigation. Failure to cooperate with an investigation may lead to disciplinary action up to and including termination of employment.

### *Accountability*

We are all expected to be familiar with and comply with the Code and Company policies. If you have a question regarding any course of conduct, consult your direct manager. Alternatively, you can ask P&C or a member of the Legal Department.

Violations of the Code or our policies may result in disciplinary action, up to and including termination of employment. Examples of misconduct that may result in disciplinary measures include, but are not limited to:

- Engaging in conduct that is fraudulent, dishonest, or results in personal gain,
- Failing to report known or suspected violations of any Company policy,



- Failure to cooperate in a Company investigation into possible violations of Company policies, and
- Retaliating against any person who reported concerns in good faith or participates in good faith in an investigation.

The Company has other policies and processes which govern performance, conduct and behavior. Policy violations that are not Code violations will be handled under the appropriate policy or procedure.

## REPORTING CONCERNS

If you have a concern about a violation or possible violation of this Code or any of our policies, you are required to report it promptly. Your direct manager is often in the best position to resolve a concern quickly. However, you can always report a concern to P&C or the Company's Legal Counsel.

You can also report the matter to the Company's hotline, Syntrio Connects Standard. Reports can be made anonymously. You can report the matter to the hotline as follows:

- Web:  
[www.lighthouse-services.com/Comp assRE](http://www.lighthouse-services.com/Comp assRE)
- Telephone: from the US: 833-452-3111, or from India: 000 800 0501 552
- E-mail:  
[reports@lighthouse-services.com](mailto:reports@lighthouse-services.com)  
(please include company name with report)

We treat all reports seriously. The Company will promptly review and address each concern as appropriate. This may involve an

investigation. Investigations will be conducted confidentially to the extent necessary and appropriate under the circumstances.

## NO RETALIATION

We value your help in identifying and avoiding misconduct. We strictly prohibit retaliation against any person raising a concern or participating in any investigation in good faith.

Retaliation under the Code is defined as any action that would likely deter someone from reporting a concern or participation in an investigation. Retaliatory conduct includes but is not limited to, demotion, termination, reduction in salary, job reassignment, threats, or harassment taken against an individual because they raised a Code concern or participated in an investigation into a potential violation of the Code. Anti-retaliation provisions, however, will not protect you from disciplinary action stemming from your own misconduct.

If you believe you are the subject of retaliation, please report the concern to your direct manager, to P&C, or to the Company's Legal Counsel. You can also report the matter to the Company's compliance hotline.

## CHANGES TO THIS CODE

The Company reserves the right to modify the Code. The changes may be minor or they may be significant. Since the Code may be updated from time to time, please be sure to refer to the Code that is posted online, to check that you are using the most up to date version. The Company may also grant waivers to this Code, depending on the situation, in its discretion. In the extremely rare situation that a waiver is approved, the Company will quickly and properly disclose it when required by law. This Code is not a contract or promise guaranteeing



employment for any specific duration, nor does it create contractual rights of any other kind in favor of the employee.

## **RESOURCES**

Anonymous Hotline

Employee Handbook

Legal Team: [legalteam@compass.com](mailto:legalteam@compass.com)

Effective Date: May 3, 2023  
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