

# Code of Ethics and Conduct



At BPM,  
*doing the right thing*  
is part of who we are.

Our Code of Ethics and Conduct reflects our shared commitment to acting with integrity, objectivity, professionalism, and respect. We hold ourselves to high standards, staying true to our values and in full compliance with the laws and regulations that guide our work.

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**BPM is committed to**  
*maintaining the quality*  
**of our professional services**  
**without compromise.**

In addition to our internal policies, we are committed to complying with the applicable ethical requirements and professional standards of the American Institute of Certified Public Accountants (AICPA), the Public Company Accounting Oversight Board (PCAOB), the U.S. Department of Labor, the U.S. Securities and Exchange Commission, and the California Board of Accountancy, among others.

# Objectivity and independence



BPM Partners and employees (BPM colleagues) should maintain objectivity and exercise prudent professional and business judgment in all their work without being compromised by bias, undue influence, or conflicts of interest. Colleagues should not undertake a professional activity if a circumstance or relationship unduly influences their professional judgment regarding that activity.



# Conflicts of interest

A conflict of interest occurs when a colleague's personal activities or relationships interfere with their objectivity.

**Conflicts of interest can lead to legal liability and reputational harm.**

BPM colleagues should diligently avoid representing BPM in matters in which they have a direct or indirect financial interest. For audit clients, colleagues should avoid close personal relationships or activities that could cause BPM's objectivity to be diminished, even if only by appearance.





# Education and continuous learning



BPM is dedicated to the continuous learning and professional development of all colleagues.

We believe that ongoing education is essential to maintaining the highest standards of service and staying current with industry trends and regulations. Colleagues are encouraged to pursue relevant certifications, attend workshops, and participate in training programs. The Firm provides resources and support for professional development to ensure that all team members have the knowledge and skills necessary to excel in their roles and contribute to the Firm's success.

# Confidential information, data privacy and security

Confidential information includes information that is not generally known to the public.

It also includes information and data subject to data protection or privacy laws. BPM colleagues often access confidential information about clients, prospective clients, and third parties. Access to confidential information is limited to only those colleagues with a “need to know” to accomplish the purpose for which the confidential information was received or collected. We employ a variety of controls to protect our digital and physical infrastructure and comply with applicable data privacy and security standards. Our privacy policy can be found at [bpm.com/privacy-policy](https://bpm.com/privacy-policy).



# Business gifts and entertainment



Colleagues are encouraged to build relationships with our clients.

Socializing with clients may involve providing entertainment and business gifts. Any such gifts must be appropriate in nature and reasonable under the circumstances. We must not put others in a position (or allow ourselves to be put in a position) where others might view that improper influence was involved in the making of decisions because of such business gifts or entertainment. We do not offer, give, or promise anything of value to any government official or employee with the intent to influence any official act.



# Diversity, equity, inclusion, and belonging

Diversity, equity, inclusion, and belonging (DEIB) is an integral part of the culture at BPM.

The Firm is committed to cultivating a workplace where individual ideas, knowledge, and perspectives are accepted and respected. We implement this in many ways. We advocate for the recruitment, advancement, retention, and equitable treatment of all colleagues in the workplace. We value diverse perspectives, encourage diversity of thought, and support pay equality for all colleagues. We identify growth opportunities for colleagues from underrepresented groups and maintain a safe environment where colleagues feel seen, heard, and valued. It is critical to BPM that all colleagues feel empowered to be their whole, authentic selves at work.



# Anti-discrimination and harassment



BPM is committed to providing a work environment free from discrimination and harassment.

We do not tolerate any form of discrimination or harassment based on race, color, religion, sex, national origin, age, disability, genetic information, sexual orientation, gender identity, or any other characteristic protected by law. All BPM colleagues are expected to treat each other with respect and dignity. Any behavior that undermines this commitment will not be tolerated. If you experience or witness any form of discrimination or harassment, you are encouraged to report it immediately to a member of leadership or through the hotline identified in this Code under Red Flag Reporting.



# Fair dealing and anti-corruption

All colleagues must conduct themselves in a manner to ensure fair dealing in all business practices.

We do not make false or disparaging statements about competitors or their services. We prohibit all forms of bribery (including kickbacks or gifts on any portion of contract payments), corruption, extortion, embezzlement, and fraud. We adhere to all applicable laws, including those governing anti-bribery, anti-corruption, and anti-money laundering. Further, we only conduct business with reputable clients and third parties involved in legitimate business activities. BPM will update its anti-corruption policy as necessary based on new laws or reported cases.





# Insider trading



At times, colleagues may receive material non-public information about a client or a third party related to the client.

It is unethical and illegal to buy, sell, trade, or otherwise participate in transactions involving securities while in possession of such information or to disclose such non-public information to another individual or third party. It is also important not to discuss client information in public places and to avoid making inadvertent disclosures of non-public client information to third parties, including family members of colleagues.

# Government contracting

BPM is committed to complying with all laws, regulations, standards, and contractual obligations related to contracting with government entities.

BPM takes special care with respect to seeking or providing information regarding competitive proposals for government entities' work by other firms, complying with mandatory disclosure rules for government contracting, and providing gifts or anything of value to a government employee.





# Anti-competitive practices



BPM complies with all applicable anti-trust and anti-competitive laws and regulations. We do not engage in any business practices that unlawfully prevent or reduce competition in the market. Colleagues must be cautious of sharing information with or receiving information from competitors of BPM, including information such as fees/rates, client lists, requests for proposals, and wages/compensation.



# Political activities

No resources of BPM may be used directly or indirectly for any political purposes unless permissible under applicable law approved in accordance with Firm policy. However, BPM colleagues may voluntarily participate in political activities, including making contributions to candidates or parties or supporting issues or causes of their choice, so long as such individual political activity takes place on their own time and the colleague does not use their status as a partner or employee of BPM in support of a particular candidate, party, or issue.



# Firm sponsorships, charitable contributions, and annual memberships



BPM Colleagues may submit requests for Firm sponsorships, charitable contributions, and annual memberships to BPM's Marketing Team.

Requests will be reviewed to ensure alignment with BPM's strategic goals and practice group initiatives. From time to time, BPM may also choose to match monetary donations made by colleagues to specific organizations up to a designated goal, typically a collective response to a natural disaster or values-aligned community issue.

# Human rights

BPM does not tolerate abuses of any individual's human rights, including discrimination, bullying, physical violence, or forced labor.

All Colleagues must be free to terminate their positions at any time, and work must be conducted on freely agreed-upon terms. Additionally, BPM expects that its suppliers and subcontractors will take steps to prohibit the same abuses in their business operations.





# Reporting concerns / no retaliation



If you become aware of any ethical concern regarding BPM as an organization or a colleague at BPM, or believe that any law, policy, or principle has been breached, this should be reported immediately. BPM will investigate all concerns and make all efforts to protect the confidentiality of those who raise concerns. No retaliation will be permitted against any person who reports a concern about alleged unethical or illegal conduct in good faith or who cooperate with an investigation into such conduct.

**BPM also prohibits retaliation for conduct protected under any applicable federal, state, or local whistleblower statutes.**

# Violations of the BPM Code of Ethics and Conduct



This Code of Ethics and Conduct is intended to assist our Firm and its colleagues in complying with applicable laws, regulations, and standards and should be used as a guide in our daily practices when representing clients and supporting the Firm's business operations. It also affirms our ongoing commitment to ethical service and accountability to our clients and communities.

Any reported violations of BPM's Code of Ethics and Conduct will be thoroughly and promptly investigated by a disinterested party and reported to BPM's board of directors. Any confirmed violations may be grounds for discipline and/or termination by BPM. Any contracts made with business partners in breach of this Code shall be subject to appropriate amendment or cancellation.

# Red Flag Reporting



BPM has implemented an ethics and compliance hotline called Red Flag Reporting.

Red Flag Reporting is an independent company that protects organizations, their colleagues, assets, and reputations. Red Flag allows anyone to report concerns regarding improper activity within the workplace: this could range from financial concerns such as theft or misstated financial statements to workplace concerns such as harassment, discrimination, safety issues, substance abuse, compliance issues, or the like. Red Flag Reporting is independent of BPM, allowing someone who brings forth an issue to remain completely anonymous.

## Changes to the BPM Code of Ethics and Conduct

This Code of Ethics and Conduct will be reviewed annually and distributed to all colleagues during their new hire orientation. BPM reserves the right to modify, revise, or otherwise amend this Code of Ethics and Conduct at any time and from time to time to address new laws or regulations or for additional reasons as BPM deems appropriate.

## *How to file a report*

**To file a report, provide client code **BPM** and simply do one of the following:**

- Visit [www.RedFlagReporting.com](http://www.RedFlagReporting.com) and click on "File a Report"
- Call 1-877-647-3335
- Text RFR to 234-231-9005

**You may also use the following (be sure to be detail-oriented, provide our client code **BPM**, and indicate if you wish to be anonymous or not):**

- Fax to 330-572-8146
- Email to [redflag@redflagreporting.com](mailto:redflag@redflagreporting.com)
- Mail to RFR,  
P.O. Box 4230,  
Akron, Ohio 44321





Because  
People  
Matter

