

# Code of Conduct 2025



# Table of Contents

<b><u>A Message from our CEO</u></b>	<b><u>3</u></b>	<b><u>Commitment to our team</u></b>	<b><u>12</u></b>
<b><u>iCIMS mission and values</u></b>	<b><u>4</u></b>	<u>Compliance with employment laws</u>	
<b><u>About this Code of Conduct</u></b>	<b><u>5</u></b>	<u>Harassment – free workplace</u>	
<b><u>Commitment to compliance</u></b>	<b><u>6</u></b>	<u>Anti-retaliation</u>	
<u>Honest &amp; ethical conduct</u>		<u>Safe workplace</u>	
<u>Conflicts of interest</u>		<u>Employee training</u>	
<u>Outside employment and business activities</u>		<u>Diversity, equity, and inclusion</u>	
<u>Competition and fair dealing</u>		<u>External communications</u>	
<u>Intellectual Property (IP)</u>		<u>Support from management</u>	
<u>Protection &amp; proper use of iCIMS assets</u>		<b><u>Commitment to our communities</u></b>	<b><u>15</u></b>
<u>Data privacy and security</u>		<u>Anti-slavery &amp; human trafficking</u>	
<u>Anti-corruption &amp; bribery</u>		<u>Environmental, Social, and Governance (ESG)</u>	
<u>Gifts &amp; entertainment</u>		<u>Charitable contributions</u>	
<u>Interaction with Government officials</u>			
<u>Political activities</u>			
<u>Anti-money laundering</u>			
<u>Trade sanctions and anti-boycott compliance</u>			
<u>Compliance with laws</u>			
<u>Questions, reporting concerns, and whistleblowing</u>			
		Published: February 2025	



# A Message from our CEO



**Jason Edelboim**

Chief Executive Officer  
iCIMS

## Our valued iCIMS community

iCIMS is a leading provider of talent acquisition software that delivers world class hiring technology. We provide our customers with the right technology to support their talent acquisition and retention strategies while maintaining our reputation as an industry leader and an ethical corporate citizen. To continue this impeccable reputation, we at iCIMS must ensure that our actions demonstrate our commitment to ethical business practices in all aspects of building and delivering our award-winning talent software. As such, we are delighted to commit to this iCIMS Code of Conduct.

Our iCIMS Code of Conduct outlines our values, mission and commitments for our employees so that iCIMS can strive toward a sustainable future where we continue to improve our products for an ever-changing world. Through our Code, we commit to fostering a culture of inclusion where every iCIMS employee understands their role, how their ethical conduct and impact leads to iCIMS success, and each employee feels empowered to share their ideas and opinions to continue our growth mindset. All iCIMS employees must review this Code and use this as a tool to understand how they can continue to support iCIMS's mission and values to succeed in an ethical and responsible way.

We share the iCIMS Code of Conduct with our larger community of current and prospective customers, vendors and partners to be transparent about our commitments, values and mission. The steps iCIMS takes are founded on principles of fairness, accountability and compliance. We are proud of the work that we do at iCIMS, and we strive to continue to be an honorable company to best serve our incredible community of iCIMS customers.

Our team differentiates iCIMS by enabling our customers to attract, engage, hire and advance the right talent through ethical conduct, compassion for our communities and dedication to conducting business in the proper way. We appreciate our employees' continued commitment to make iCIMS the best place to work and the best solution for empowering organizations to build a winning workforce of talented and dedicated individuals.

**Jason**

# icIMS Mission and Values

icIMS is dedicated to providing our customers with the best experience for a reliable and innovative hiring platform. To do this, every one of us at every level of the organization needs to understand and be dedicated to our mission, purpose and values, which are listed below.

**What we do? – Our mission**

icIMS empowers organizations to attract, engage, hire and advance the right talent that builds a diverse, winning workforce. We deliver people-driven transformation to move our customers’ businesses forward, because when you have the right talent join the right team, any organization wins.

**Why we do it? – Our purpose**

At icIMS, we strive to passionately deliver the world’s leading talent acquisition software, empowering organizations to build the best teams and winning workforce that deliver transformative results.

**What drives us? – Our values**

At icIMS, a culture based on trust, respect and inclusion is our highest priority. icIMS encourages and trusts its employees to live its values each and every day.

## icims Values

Personal Accountability	to bring passion, drive, and ownership to your role, our business objectives, and your career development
Customer Obsession	no matter your role
Trust	that your colleagues have positive intent
Transparency	honest, respectful, constructive discussions about the business
Flexibility	there will always be change
Inclusivity	by respecting different backgrounds and opinions

# About this Code of Conduct

As a multi-national organization, iCIMS is committed to being a responsible and ethical corporate citizen. This important undertaking stems from our dedication to our employees, customers, vendors, partners, and other key external stakeholders that we will operate as an ethical, transparent, and compliant organization. iCIMS and its employees strive to conduct business with integrity so that we continue to demonstrate that our company upholds the highest standards of ethical behavior befitting a company that provides world class hiring technology solutions to attract, engage, hire, and advance the talent that builds a diverse, winning workforce.

To ensure our employees, customers, and external partners recognize our commitment to ethical, honest, and compliant business practices, we have developed this Code of Conduct (the “Code”) to reflect our mission and how we live out our values. In our rapidly-evolving global economy, we need to ensure that we are holding ourselves accountable and delivering on our promises. This Code is intended to provide an overview of iCIMS’ standards, commitments, and policies regarding our practices as an organization, both for how we treat our employees and how we conduct our business. affiliates iCIMS employee must incorporate our mission and vision into their day-to-day job performance, striving to meet iCIMS’ values and customer needs in everything we do. We also strive to engage with businesses that have these same high standards, across affiliates our relationships from vendors to partners.

Please note, this Code has been written to serve only as a guide to iCIMS’ and its affiliates and subsidiaries’ directors, officers, and employees (collectively “employees”). iCIMS expects members of our extended workforce, including temporary workers, vendors, independent contractors, and agents who may temporarily be assigned to perform customer related services or work for iCIMS, to review this Code in connection with their work for iCIMS and commit to complying with our Supplier Code of Conduct. This Code is not intended to address all possible situations that iCIMS employees may face, and we

strongly encourage all employees to review our internal policies and procedures to ensure they understand iCIMS’ expectations and that they can comply with their obligations. Also, when appropriate, iCIMS may update this Code and our internal policies and procedures as needed to best address our business needs and risks.

Finally, this Code is intended for public use, and as such may not contain all the details of a particular internal policy or process.

It is iCIMS’ policy to comply with the laws and regulations applicable to all aspects of our business, and this Code demonstrates our commitment to do so. iCIMS also strives to align with the principles of international standards and frameworks such as the [United Nations \(UN\) Guiding Principles on Business and Human Rights](#) and the [International Labour Organization \(ILO\) Declaration of Fundamental Principles and Rights at Work](#). iCIMS employees should reach out to [compliance@icims.com](mailto:compliance@icims.com) if you have a question, concern, or suggestion regarding their obligations. iCIMS employees can also report or escalate concerns or misconduct to their manager, HR Business Partner, the General Counsel’s Office, and/or through the [iCIMS Integrity Helpline](#). For iCIMS’ customers, partners, and vendors, each should consult their own corporate management or legal counsel for advice regarding how certain laws, regulations, or standards apply to their actions



# Commitment to compliance

iCIMS is committed to achieving the highest standards of professionalism and ethical conduct in its operations and activities. As such, iCIMS recognizes that certain rules and regulations regarding the behavior of its employees are necessary for the efficient operation of iCIMS. iCIMS also expects the same high standards of its customers, partners, and vendors.

## Honest & ethical conduct

iCIMS promotes high standards of integrity by conducting business honestly and ethically. As an employee, it is important to demonstrate this commitment by incorporating our values in your everyday activities. iCIMS' expectation is that all employees act with integrity and observe the highest ethical standards of business conduct when working with our customers, vendors, partners, competitors, employees, or anyone else they encounter in the course of their employment. It is our responsibility to hold ourselves accountable for our actions. iCIMS employees should be honest and truthful in all aspects of their work.

iCIMS strives to conduct its business dealings fairly and honestly, and seeks competitive advantages through superior performance, not unethical or illegal business practices. Stealing proprietary information, possessing trade secret information that was obtained without the owner's consent, or inducing such disclosures from past or present employees of other companies is strictly prohibited. iCIMS' employees, officers and directors must respect the rights of and deal fairly with its customers, suppliers, competitors and employees. No employee, officer, or director should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other intentional unfair business practice.

## Conflicts of interest

iCIMS employees must act in the best interest of our company through the course of their employment with iCIMS and not based on personal interests or relationships which result in a conflict of interest. A conflict of interest arises when a personal private interest interferes or appears to interfere with the individual's ability to do their job duties objectively and fairly. Employees must seek to avoid any situations where there is an actual or perceived conflict, such as:

- Outside business activities
- Ownership in another business
- Hiring a family member for a job if the employee would have influence over the family member's employment or compensation
- Hiring a family business as a partner of iCIMS

All iCIMS employees must avoid any relationship or outside business activity that might impair or appear to impair their ability to make objective and fair decisions when it involves iCIMS. At times, an employee may be faced with situations in which business actions taken on behalf of iCIMS may conflict with the employee's own personal interests. iCIMS employees are prohibited from using any iCIMS business opportunity for private or personal gain during the course of their employment or provision of services to iCIMS. In addition, iCIMS' employees, officers and directors are prohibited from using iCIMS' property, information (either belonging to iCIMS or any information which iCIMS has in confidence), or their position, for personal gain or to compete with iCIMS.

## Commitment to compliance

If you have a question, concern, or point of clarification about an actual or perceived conflict of interest, each employee must contact their manager, HR Business Partner, or the General Counsel's Office.



### Outside employment and business activities

iCIMS employees agree to serve iCIMS faithfully and to the best of their ability, and any actual or perceived conflict of interest should be avoided wherever possible. This means that every one of us at every level of the organization is committed to devoting our entire business time, energy, and skill to such employment, and to using our best efforts, skill, and ability to promote the interests of iCIMS. iCIMS employees agree not to provide services (whether directly or indirectly) of a business, professional, or technical nature that relate to the iCIMS business, whether for compensation or otherwise, without the prior written approval of iCIMS' executive management or in accordance with the employee's employment agreement. Notwithstanding the foregoing, iCIMS does not prohibit employees from making passive personal investments.

### Competition and fair dealing

iCIMS conducts business fairly and honestly in the marketplace. Any unfair, anti-competitive, unethical, or illegal business practices are strictly prohibited. We strive to provide the best hiring technology solutions to help our customers with their talent acquisition needs, which can only be accomplished when iCIMS engages in honest and equitable business practices.

In our marketplace, iCIMS strives to compete fairly and objectively with our competitors. Stealing proprietary information, possessing competitive trade secret information, or eliciting such information by past or present employees of iCIMS is anti-competitive and strictly prohibited. iCIMS' employees must respect the rights of its competitors. No employee may use any form of manipulation, concealment, abuse of privileged information, misrepresentation of material facts, use of non-public information to gain an advantage (insider trading), or any other intentional unfair-dealing practice to induce any business venture. Competitive intelligence should always be obtained from legitimate sources, such as publicly available information from news accounts, industry surveys, competitors' displays at conferences and trade shows, and information publicly available on the internet.

Fair dealing extends beyond our competitors, and includes our customers, suppliers, vendors, partners, and other entities we work with. iCIMS should strive to compete fairly and therefore prohibits practices such as exclusive dealings, resale restrictions, and/or selective discounting that, depending on the business justification and the effect on competition, can be unfair and would lead to antitrust or competition law violations.

If an iCIMS employee observes or has knowledge of another employee, supplier, vendor, or customer acting in a manner that is unfair, dishonest, or anti-competitive, that employee should report those activities to their manager, HR Business Partner, the General Counsel's Office, or through the [iCIMS Integrity Helpline](#). If you have questions or concerns, you can reach out to [compliance@icims.com](mailto:compliance@icims.com).



## Commitment to compliance



### Intellectual Property (IP)

Our intellectual property (IP) and confidential information are valuable assets of iCIMS and should be appropriately protected. iCIMS' intellectual property includes our patents, copyrights, trademarks, and trade secrets. Much like the fair and honest actions we are obligated to take to maintain a competitive marketplace, iCIMS employees must act to protect our IP and not jeopardize it through business or personal use. IP owned by iCIMS should be used to benefit our company and to drive better solutions for our customers.

### Protection & proper use of iCIMS assets

All employees are required to protect iCIMS' assets and ensure their efficient use. Theft, carelessness, fraud, and waste are prohibited, as these have a direct impact on iCIMS' ability to perform its obligations to our customers. It is never acceptable for iCIMS employees to take part (no matter how small your role) in any activity that involves theft, fraud, embezzlement, extortion, or misappropriation of property when it comes to iCIMS business. All iCIMS assets should be used only for legitimate business purposes. Any suspected incident of fraud or theft should be reported for investigation to your manager, HR Business Partner, the General Counsel's Office, Information Security Department, or through the [iCIMS Integrity Helpline](#).

The obligation to protect iCIMS' assets also includes iCIMS' proprietary information, as further detailed in iCIMS internal policies. This obligation extends to the confidential information that we possess belonging to third parties. Unauthorized use or distribution of this information is prohibited and could also be illegal and result in civil or criminal penalties.

## Data Privacy and Security

As a SaaS-based software provider with thousands of customers around the world, and over 120 million employment applications processed on an annual basis, iCIMS recognizes that the privacy and security of the data we store and process is of the utmost importance. Accordingly, we are committed to maintaining data policies and processes that meet or exceed current standards and best practices. These policies and processes are audited annually by independent third-party organizations and are ISO:27001, ISO:27701, and SOC 2 Type II certified, to provide our customers with assurances that our information management systems are controlled, documented, and aligned with internationally recognized standards. More information on our data privacy and security commitments can be found at our [Trust Center Portal](#).



## Commitment to compliance

### Anti-corruption & bribery

iCIMS has zero-tolerance for any form of bribery, corruption, or kickbacks when our employees or third parties conduct business or establish relationships on behalf of iCIMS. Whether we are interacting with government officials or a private party in commercial transactions anywhere in the world, iCIMS is committed to winning business through fair and honest competition. Our expectation for iCIMS employees is that we act with integrity and professionalism in all business practices and relationships. Accordingly, iCIMS strictly prohibits any illegal or unethical payment, whether to government officials or a private party in commercial transactions anywhere in the world. iCIMS employees are expected to comply with all applicable laws and regulations, which include but are not limited to the U.S. Foreign Corrupt Practices Act (FCPA) and U.K. Bribery Act 2010.

Illegal or unethical payments provided by iCIMS employees or third-party partners, vendors, suppliers, or other external business associates are not tolerated and include but are not limited to the following:

- Cash payments
- Lavish or excessive gifts or entertainment
- Products or services provided at a discount outside the ordinary course of business
- Any other advantages or items of value that are disproportionate or extravagant

Further, all iCIMS employees, third parties, or representatives have an obligation to record all transactions involving an iCIMS expense or the disposal or transfer of iCIMS’ assets fairly, accurately, and in compliance with laws and iCIMS policies. iCIMS is committed to complying with all applicable anti-bribery and anti-corruption laws, and any form of criminal conduct will not be tolerated and should be reported immediately.

### Gifts & Entertainment

Giving and receiving gifts and entertainment can help build strong working relationships and goodwill with customers and other business partners. However, any gifts and entertainment that are extravagant or lack a legitimate business purpose may create an actual or perceived conflict of interest.

Any interest that is seen as unfair or used to inappropriately influence business decisions is considered a bribe or corruption. As discussed previously, iCIMS prohibits any form of bribery, corruption, or kickbacks. As such, iCIMS employees are prohibited from seeking, accepting, or giving anything of value to inappropriately influence business decisions. This includes but is not limited to gifts, favors, entertainment, payment, or loans to any customer, vendor, partner, or other party doing business with iCIMS, except for items of nominal value on behalf of iCIMS. This prohibition extends to the family members of any customer, vendor, partner or other party doing business with iCIMS. Cash is never an acceptable gift or gratuity and is not permitted. iCIMS has a strict no tolerance policy for cash being provided or received as a gift, gratuity, or favor. Before providing or accepting, directly or indirectly, any travel, meals or entertainment expenditure, employees should check to ensure such gift or entertainment is in line with iCIMS’ policies and, if the employee is providing such gift or entertainment, that it has been approved by their supervisor.

## Commitment of compliance

### Interactions with Government officials

As a multi-national organization with thousands of customers around the world, iCIMS recognizes the importance of upholding the highest standards of ethical behavior. iCIMS must ensure that it complies with all legal requirements and appropriate business practices, especially with our government and quasi-government customers. Therefore, all employees must ensure that they comply with laws and other requirements to ensure that all business interactions are appropriate and in compliance with anti-corruption, anti-bribery and ethics laws, which include but are not limited to the US Foreign Corrupt Practices Act, the UK Bribery Act, and “local law”<sup>1</sup> and local criminal codes which prohibit bribery and other forms of corruption.

Please remember that government entities include more than just elected officials. These entities can include, but are not limited to, public schools and universities, police departments, fire departments, publicly owned hospitals, or any other publicly owned businesses or entities. All business interactions and relationships with our government customers require the upmost ethical conduct and compliance with all iCIMS policies.

### Political Activities

iCIMS does have customers that are governmental or quasi-governmental, and as a result, regulatory obligations and prohibitions are placed on iCIMS and its employees when it comes to political activities. Political activities include political contributions, volunteering for political campaigns, running for political office, or hosting political fundraisers. iCIMS takes its regulatory obligations for political activities very seriously in all jurisdictions where iCIMS operates. iCIMS strictly prohibits any political activity being provided or completed in an effort to influence or appear to influence iCIMS business as stated above in the Anti-corruption and Bribery section of this Code. In most jurisdictions, iCIMS as a company is also prohibited from making political contributions to a candidate, but there may be other requirements based on the jurisdiction or local laws. iCIMS employees should not use iCIMS

<sup>1</sup> Reference in this Code to “local laws” also include laws in countries outside of the U.S. where iCIMS maintains operations.

property, resources (including employee work time), funds, or facilities for any personal political activity as a result. iCIMS employees can reach out to the General Counsel’s Office at [compliance@icims.com](mailto:compliance@icims.com) for any questions, concerns, or inquiries about political activities.

## Anti-money laundering

We aim to provide the iCIMS talent acquisition solutions as a single recruiting platform that delivers transformative solutions to help our customers attract, engage, hire, and advance the right talent through purposeful and legitimate business transactions. At no point does iCIMS endorse nor tolerate business dealings or transactions that facilitate or involve money laundering in any form. iCIMS also does not tolerate support of corrupt or terrorist organizations in any form. iCIMS is committed to complying with all applicable anti-money laundering laws to ensure we are being a responsible and ethical corporate citizen.



## Commitment to Compliance

### Trade sanctions and anti-boycott compliance

iCIMS has customers globally, which means that although we don't physically provide products, our software is used in different geographies and locations around the world. As such, iCIMS is expected to and does commit to complying with applicable trade restrictions/sanctions and anti-boycott laws.

iCIMS employees need to be aware that there are certain restrictions on the countries we can do business in as well as individuals or entities we may be restricted from doing business with. This responsibility applies to all aspects of our supply chain and requires that iCIMS take appropriate steps to address these restrictions with our software and services. In addition to trade requirements, iCIMS also complies with anti-boycott laws when applicable, which prohibit participation in boycotts that the U.S. does not support and prevents companies from being used to implement foreign policies.

### Compliance with Laws

Employees must comply with all applicable laws, rules, and regulations in the locations in which iCIMS operates. Employees are encouraged to seek advice from the General Counsel's Office whenever they have questions about compliance with any laws.

### Questions, Reporting concerns, and whistleblowing

It is the intent of iCIMS to adhere to all laws and regulations that apply to the organization, and the purpose of this Code, and iCIMS' internal policies and procedures, is to support the organization's dual goals of legal compliance and transparency. Employees are expected and encouraged to report to iCIMS any suspected unlawful activity, misconduct, or other violation of any law or iCIMS policy so that management can investigate and correct the alleged unlawful activity.

If you have questions or concerns regarding a potential violation of this Code, or reasonably believe that an iCIMS policy, practice, or activity is violating a law, please report it. Questions and concerns may be shared with your manager, HR Business Partner, the

General Counsel's Office, or by contacting [compliance@icims.com](mailto:compliance@icims.com). In some regions and countries, you may also be able to share concerns anonymously through the [iCIMS Integrity Helpline](#), however, iCIMS encourages you to provide as much information as possible so the report can be fully investigated.

iCIMS also encourages customers, vendors, and partners to report any reasonable suspicion that iCIMS or an iCIMS employee has violated a law or this Code by sending a notice to the iCIMS Compliance Department ([compliance@icims.com](mailto:compliance@icims.com)) or iCIMS General Counsel's Office ([generalcounsel@icims.com](mailto:generalcounsel@icims.com)).

iCIMS prohibits retaliation against any employee who makes a good faith report or participates in an investigation of a possible violation of our Code, policies, or the law.



# Commitment to our team

iCIMS values the many talents and abilities of our employees and seeks to foster an open, cooperative, and dynamic environment where our employees can thrive. iCIMS is committed to ensuring a safe, fair, and ethical workplace, and adheres to applicable laws and regulations concerning treatment of its employees.

We all work every day to make iCIMS a place where everyone has a right to belong, diversity is celebrated, inclusion is the norm, and we all work together and learn from one another. We appreciate the value our employees bring to our customers, our products, and our culture. Together, we must continue to foster that culture – an inclusive environment where everyone can thrive.

## Compliance with employment laws

iCIMS complies with all applicable state and local laws regarding employment and is committed to providing equal employment opportunities to all qualified individuals. Consistent with this commitment, iCIMS is an Equal Employment Opportunity employer and provides reasonable accommodations to applicants and employees with disabilities. The diversity of the iCIMS' workforce helps us serve our diverse customer base and the communities in which our customers live and work. We expect everyone to recognize, respect, and value that there are differences among us. All aspects of employment are based on merit, performance, competence, and business need. iCIMS strictly prohibits and does not tolerate discrimination or harassment against employees, applicants or any other covered persons because of race, color, religion, national origin or ancestry, sex (including pregnancy), gender identity or expression, sexual orientation, age, marital status, physical or mental disability, medical condition, veteran status, or any other characteristic protected under applicable law.

iCIMS' Equal Employment Opportunity policy applies to all policies and procedures relating to recruitment and selection, testing, hiring, training, promotion, transfer, discipline, layoff, work environment, compensation, benefits, termination, reinstatement and all other terms

and conditions of employment. In addition, iCIMS maintains an Affirmative Action plan to support affirmative action for the recruitment, hiring, and advancement of qualified minorities, women, individuals with disabilities, and veterans. We collect diversity data and review it monthly, and have developed a strategic approach to promote diversity, equity, and inclusion. iCIMS employee resource groups host internal events and information sessions on commonalities across generations and career areas on issues that are close to our employees' hearts..

## Harassment – free workplace

iCIMS believes everyone should be treated with dignity and respect. As such, iCIMS strictly prohibits harassment or bullying in any form against employees, interns, contractors, partners, customers, or visitors to its offices based on any legally protected characteristic.

The above applies to all applicants and employees, and all forms of harassment and/or discrimination whether engaged in by fellow employees, by a supervisor or manager, or by someone not directly connected to iCIMS (i.e., an outside vendor, partner, consultant, or customer) are strictly prohibited.

## Anti-retaliation

iCIMS prohibits any form of discipline, reprisal, intimidation, or retaliation against any employee for good faith reporting of incidents of discrimination or harassment, or violations of any policy or procedure, including pursuing any discrimination claim or cooperating in related investigations. Anyone found to be engaging in any type of unlawful discrimination or retaliation may be subject to corrective and/or disciplinary action.



## Commitment to our team

### Safe workplace

iCIMS is committed to providing a safe, healthy workplace and strives to eliminate or minimize accidents in the workplace. Behavior that poses a risk to the safety, health, or security of our employees, extended workforce, or visitors is prohibited. Each employee is responsible for maintaining a safe and healthy workplace by following all safety rules and policies, and reporting accidents, injuries, and unsafe equipment, practices, and conditions in a timely manner. Life-threatening emergencies should first be reported to the local law enforcement and then reported to iCIMS.

Being under the influence of alcohol or illegal drugs while on the job poses serious health and safety risks to employees and others and is strictly prohibited.

iCIMS monitors local laws and guidance concerning health and safety regulations in order to promote a healthy workplace and ensure that our employees are aware of their rights and responsibilities regarding working in our office environments.

### Employee training

iCIMS works to not only have the right team to move our business forward, but also to provide our employees with the right tools to successfully do their job. Training is one of the many tools iCIMS provides to its employees to understand the importance of our obligations. All iCIMS employees complete relevant training on an annual basis, which include topics like Data Protection and Privacy Compliance, Ethics and Compliance Essentials, Preventing Discrimination and Harassment, Information Security, and other areas covered in this Code.

### Diversity, equity, and inclusion

iCIMS recognizes the importance of fostering a corporate culture that is reflective of the communities in which we live and serve. As such, iCIMS created its Diversity, Equity & Inclusion (DEI) framework to look at diversity, equity, and inclusion through the lens of our communities, colleagues, and customers. The nature of upholding a strong, companywide DEI strategy helps iCIMS to identify ways we can continue to be good corporate citizens, starting with inclusion as a core value – introduced at the inception of



an employees' relationship with the company. Employee Resource Groups (ERGs) are created through employee interest, with programmatic support from the Talent team to ensure their goals come to life at iCIMS to ensure a firm and consistent commitment to diversity, equity and inclusion.

In addition, we are aware of the potential for technology to create or reinforce biases. With respect to our products, we conduct ongoing reviews to identify and help us address or avoid potential biases (e.g., racial discrimination, social exclusion, or technology addiction) in our algorithms and data inputs. Members of our organization are passionate about ethical AI and we work to provide checks and balances so that our customers have positive outcomes.

## Commitment to our team

### External communications

iCIMS recognizes the importance of communicating with our broader iCIMS community through different methods such as our website, customer programs, our Community Site, conferences, webinars, social media posts, or other forms of communication. Communicating with our external community helps to keep them informed and current on iCIMS' products, new features, or services to best assist them to attract, engage, hire, and advance the right talent. Those communications must always be fair, honest, and truthful. iCIMS prohibits communications that are unethical, dishonest, anti-competitive, or unfair. iCIMS employees should never share information that is confidential and should strive to follow our Corporate Communications Policies. For any questions from the press, please reach out to [press@icims.com](mailto:press@icims.com).

### Support from management

iCIMS team members are the key component of what makes iCIMS the outstanding leader in our industry, but the expectation for excellence begins with our tone from the top. Managers and leaders within our company who are dedicated to the iCIMS values and the demonstrating how to put those values into action. As ethical role models, managers and senior leaders must stay vigilant to ensure their teams know how to address concerns or who they can turn to within our business. Managers should always:

- Be informative and transparent to help employees understand iCIMS **clear vision**.
- Be a **committed leadership team** and lead by example to demonstrate what success looks like at iCIMS
- Be an available and **engaging manager** to provide effective coaching to drive outstanding performance.
- Provide direction and **resources** to help teams effectively do their jobs and develop with evolving **opportunities**.





# Commitment to our communities

## Anti-slavery & Human Trafficking

iCIMS is committed to compliance with all applicable laws and regulations that intend to combat modern slavery, human trafficking, child labor, and other such forms of inhumane conduct. iCIMS maintains a firm commitment to ensure that such behaviors do not exist in our business. iCIMS does not tolerate any form of modern slavery in our company and we are dedicated to assessing our suppliers, vendors, and partners to ensure that their commitment to opposing modern slavery matches our own. To that end, we maintain a Modern Slavery Act compliance statement (in accordance with the UK and Canadian Modern Slavery Acts and California Transparency in Supply Chain Act).

## Environmental, Social, and Governance (ESG)

We take pride in creating work environments that engage our employees and give back to our communities, demonstrating our commitment to being a good corporate neighbor and global citizen. [Environmental, Social, and Governance \(ESG\)](#) is core to iCIMS purpose to strive toward a sustainable future of growth, innovation, and community impact. As iCIMS continues to evaluate, implement, and improve our ESG program, we look to be environmentally conscious, socially impactful, and to continually improve our policies and processes to govern our business in accordance with our values. We believe this focus on good governance concepts and shared social values helps us attract, motivate, and retain top talent at all levels. We are proud of the culture and community that we have established at iCIMS, and we are passionate about continuing to deliver it for our employees, customers, and communities.

## Charitable contributions

iCIMS is dedicated to supporting our community to be a thoughtful and responsible corporate citizen, and part of that commitment is through charitable contributions. iCIMS strives to partner with charitable organizations and make donations to support their worthwhile missions. To ensure iCIMS employees are acting in the best interest of iCIMS, all employees are required to comply with applicable laws and regulations when it comes to charitable giving to ensure our actions are responsible. We encourage our employees to invest in and support their communities through philanthropic giving and community service projects. By seeking to create opportunities for employees to donate their time on issues that matter to them, we continue to evolve our culture to be leaders and champions of community. We also promote days of service and partner with community groups on these efforts to foster a culture of dedication to our community. For monetary donations, charitable contributions should be made in accordance with our anti-bribery and anti-corruption efforts. No charitable contribution should be made in an effort to influence or obtain an unfair advantage when it comes to our business activities, but instead given to support the communities we serve.

**icims<sup>®</sup>**