



# Code of Conduct

**VERSION****1.0****EFFECTIVE DATE****2026-07-31****POLICY OWNER****Matt Sapio, CISO****APPROVED BY****Matt Sapio**

## 1. Purpose

This Code of Conduct establishes the core workplace, ethical, and conduct standards expected of Eigenomic personnel. It is intended to provide a practical employee handbook for Eigenomic's small, fully remote workforce while supporting a respectful, secure, and ethical workplace.

## 2. Scope

This policy applies to all Eigenomic employees and, where relevant, contractors and other parties working on Eigenomic's behalf. It applies to remote work, electronic communications, customer interactions, business activities, and conduct while representing Eigenomic.

## 3. General Principles

- **Respect and Integrity:**

- Treat all colleagues, clients, and partners with respect, dignity, and fairness.
- Be honest and transparent in all communications and actions.

- **Compliance:**

- Adhere to all applicable laws, regulations, and company policies.
- Maintain confidentiality and protect sensitive or proprietary information.

- **Accountability:**

- Accept responsibility for your actions and be open to feedback and improvement.

- Report unethical behavior or violations of this Code through the proper channels.

## 4. Acceptable Behavior

- **Professionalism:**
  - Maintain a positive and professional demeanor at all times.
  - Maintain appropriate professional appearance and conduct for customer meetings and other business interactions.
- **Collaboration and Communication:**
  - Communicate clearly and respectfully, listen actively, and foster teamwork.
  - Embrace diversity and contribute to an inclusive work environment.
- **Use of Resources:**
  - Use Eigenomic resources, systems, accounts, time, and information responsibly and primarily for authorized business purposes.
  - Follow guidelines on the use of company systems and data to protect both personal and organizational interests.

## 5. Unacceptable Behavior

- **Harassment and Discrimination:**
  - Harassing, discriminating against, or bullying others based on race, gender, age, religion, disability, sexual orientation, or any other protected characteristic is strictly prohibited.
- **Abuse of Authority:**
  - Any misuse of power or authority, including intimidation or favoritism, is unacceptable.
- **Conflict of Interest:**
  - Engage in activities or decisions that conflict with the organization's interests or compromise its integrity.
- **Substance Abuse:**
  - The use or distribution of illegal substances, or being under the influence while performing work duties, is prohibited.
- **Violence and Threats:**

- Acts of violence or making credible threats against colleagues, clients, or any stakeholders will not be tolerated.

## **6. Weapons Policy**

- **General Prohibition:**

- Weapons, violence, and threats are prohibited at Eigenomic-sponsored in-person events and while conducting company business, subject to applicable law. Because Eigenomic is fully remote, employees remain responsible for complying with laws applicable to their personal work location.

- **Exceptions and Special Circumstances:**

- Any exception must be authorized by management and comply with applicable law.
- Employees must comply with all applicable local and federal laws regarding weapons.

## **7. Workplace Culture and Ethics**

- **Fostering a Positive Culture:**

- Encourage open communication, mutual respect, and collaboration.
- Support work-life balance and contribute to a safe and healthy work environment.

- **Ethical Decision Making:**

- Make decisions that uphold the organization's values, even when faced with challenging situations.
- Avoid behaviors or practices that could harm the organization's reputation or operational effectiveness.

- **Reporting Misconduct:**

- Promptly report any suspected violations of this Code through established channels.
- The organization will protect individuals who report misconduct in good faith and take appropriate corrective action when necessary.

## **8. Employment Practices**

## **Equal Opportunity and Respect**

Eigenomic is committed to a professional workplace free from unlawful discrimination, harassment, retaliation, bullying, and intimidation. Employment-related decisions must be based on legitimate business considerations and applicable law.

## **Remote Work Expectations**

Personnel must maintain a reliable, professional, and reasonably secure remote work environment; protect company and customer information from unauthorized viewing or access; and remain reasonably available during agreed working hours and business commitments.

## **Attendance and Communication**

Employees are expected to meet agreed schedules, deadlines, meetings, and customer obligations and to promptly communicate circumstances that materially affect their ability to perform assigned responsibilities.

# **9. Confidentiality, Security, and Company Property**

## **Confidentiality**

Company, customer, legal-client, proprietary, and other non-public information must be protected and used only for authorized business purposes. Confidentiality obligations continue after employment or engagement ends where required by agreement or law.

## **Information Security**

Personnel must follow Eigenomic's information security policies, protect credentials, use approved systems and services, promptly report suspected security incidents, and safeguard customer information handled through Eigenomic's cloud-based environment.

## **Company Property and Intellectual Property**

Company equipment, accounts, records, software, work product, and other assets must be protected from loss, misuse, or unauthorized disclosure and returned or relinquished when employment or engagement ends, as applicable.

# **10. Conflicts, Outside Activities, and Business Ethics**

## **Conflicts of Interest**

Personnel must avoid or disclose actual or potential conflicts between personal interests and Eigenomic's interests. Outside work or business activities must not interfere with responsibilities to Eigenomic, misuse confidential information, or improperly compete with the company.

## **Gifts, Fraud, and Improper Conduct**

Bribery, fraud, falsification of records, theft, kickbacks, or other dishonest or unlawful business practices are prohibited. Business courtesies must never be offered or accepted when they could improperly influence a business decision.

# **11. Reporting, Non-Retaliation, and Workplace Concerns**

## **Reporting**

Employees should promptly report suspected misconduct, harassment, discrimination, fraud, security concerns, conflicts of interest, or other policy violations to the Policy Owner or appropriate management contact.

## **Non-Retaliation**

Retaliation against a person who makes a good-faith report, participates in an investigation, or raises a workplace concern is prohibited.

## **Investigations**

Eigenomic may investigate reported concerns and expects personnel to cooperate honestly. Information will be handled as discreetly as reasonably practicable.

# **12. Employment Administration**

## **Policies and Changes**

This handbook summarizes core workplace expectations. Eigenomic may adopt, revise, or withdraw policies and procedures as business, legal, security, or operational needs change. Employees will be informed of material changes as appropriate.

## **No Contractual Guarantee**

Nothing in this handbook creates a guarantee of continued employment, a fixed term of employment, or contractual rights beyond those provided by an applicable written agreement or law.

### **Applicable Law**

Employment practices will be administered in accordance with applicable federal, state, and local law. Where a policy conflicts with applicable law, the law controls.

## **13. Compliance and Enforcement**

- **Responsibility:**
  - Every individual is responsible for adhering to this Code of Conduct.
  - Managers and supervisors must ensure that their teams understand and follow these standards.
- **Investigation and Consequences:**
  - Violations of this Code may lead to disciplinary actions, up to and including termination, as well as potential legal consequences.
  - Investigations of alleged misconduct will be conducted promptly, fairly, and confidentially.

## **14. Acknowledgment**

- Employees are required to acknowledge that they have received, read, understood, and agree to comply with this Code of Conduct. Contractors must acknowledge applicable requirements.