

Anti-Corruption, Reporting and Whistleblower Policy

We Encourage a Speak Up Culture

Choosing to speak up about workplace concerns helps build a healthy, ethical, and compliant company and is part of our culture. To promote that culture, ASGN Incorporated and its subsidiaries (“ASGN” or the “Company”) encourage employees to speak up and raise questions and concerns promptly about any situation that may violate our [Code of Business Conduct and Ethics](#), our policies, procedures, or any applicable law (collectively, the “Code”). At ASGN, our people are our most valuable asset. It benefits all of us if we raise our concerns so the Company may consider them carefully and address them properly.

Follow the Company’s Commitment to the Code

ASGN is deeply committed to promoting a culture of ethical conduct and compliance with:

- Our Code of Business Conduct and Ethics and our policies;
- The laws, rules, and regulations that govern our business operations; and
- Best practices in accounting, auditing and financial reporting matters.

The Company’s Commitment Includes Zero Tolerance for Bribery or Corruption

It is the Company’s policy to conduct all of its business in an honest and ethical manner. The Company takes a zero-tolerance approach to bribery and corruption and is committed to acting professionally, fairly and with integrity in all its business dealings and relationships.

The Company complies with all applicable anti-corruption laws, including the U.S. Anti-Kickback Act of 1986, the Foreign Corrupt Practices Act (“FCPA”), the U.K. Bribery Act (“UKBA”), and the local laws in every country in which we do business. As more fully described in our Code, the Anti-Kickback Act prohibits prime contractors and subcontractors from offering, soliciting, providing, or accepting anything of value to obtain or reward favorable treatment in connection with the award or performance of U.S. government prime contracts and subcontracts. The FCPA and the UKBA prohibit giving anything of value to a “foreign official,” for the purpose of influencing the decisions of those officials. In short, they prohibit bribery of foreign officials in any country. The Company prohibits facilitation payments that violate FCPA or law. The UKBA also prohibits private sector (commercial) bribery.

“Foreign official” is defined broadly to include:

- Any officer or employee of any government entity, department or agency;
- Any employee of a government-owned school, hospital or other public entity;
- Any employee of state-owned or state-controlled commercial enterprises;
- Any political party, party official, or candidate for political office; and
- Any person acting in an official capacity on behalf of a government entity.

It is important to keep in mind that even persons who are not deemed to be “officials” under local laws may still be considered “foreign officials” under the FCPA and UKBA.

The FCPA also mandates that companies establish and maintain accurate books and records and sufficient internal controls. The Company's policy on record-keeping, and methods for reporting concerns about accounting or auditing matters, are fully described in the Code.

The Company is committed to avoiding acts which might reflect adversely upon the integrity and reputation of the Company. Accordingly, all of our employees, officers, directors, and agents must comply with this policy and follow this commitment in all aspects of their work.

Gifts

You may not give any gift of any value to an officer or an employee of the U.S. Government or to any "foreign official" including:

- Products and Services
- Meals and beverages
- Special discounts or favors
- Donations to a charity to gain favor with a government official
- Tickets and entertainment
- Travel and accommodations
- Cash or cash equivalents
- Paying for trips for government personnel to or from Company location

Except for truthful statements about Company capabilities, any activity undertaken to induce or reward any specific act by any government is prohibited. Special caution is necessary during procurement in progress. Hosting government clients or foreign officials at events such as sporting events, theater, or lunch/dinner is not appropriate. It is a crime to give, offer, or promise anything of value to a public/foreign official for or because of any official act – whether the intent is explicit or not. There is no minimum exception for bribes or gratuities, and violating the law will result in reputational damage and fines, and possibly even imprisonment.

Raise Good Faith Questions and Concerns about Conduct which may Violate our Code

We promote an environment that fosters honest, good faith communications about matters of conduct related to our business activities, whether that conduct occurs within the Company or otherwise involves one of the Company's contractors, suppliers, consultants, or clients, or involves any other party with a business relationship with the Company. Consistent with our commitment to ethics, compliance, and the law, we welcome your good-faith questions and concerns about any conduct you believe may violate our Code, especially conduct that may be illegal, fraudulent, unethical, or retaliatory.

What Can Be Reported

Examples of activity that should be immediately reported to the Company include, but are not limited to:

- Fraud;
- Bribery;
- Gratuity, gifts, favors, entertainment, loans, or anything of monetary value given to government employees or foreign officials;
- Association with outside companies in a manner that creates a conflict of

- interest in the performance of job functions;
- Violations of the FCPA or the UKBA;
- Failure to report a significant overpayment of any contract with the government or the presentation or creation of false claims for government payment;
- Any request for an improper payment (including facilitation payments);
- Any indication that a person might be making corrupt payments;
- Any information or knowledge of any hidden fund or asset;
- Any false or artificial entry in the Company's books and records;
- Any payment that circumvents the Company's internal financial processes; or
- Other violations of the Code.

Procedure for Reporting

Employees must report potential violations of our Code, our policies, or the laws and regulations under which we do business, or any concerns regarding the Company's accounting, internal accounting controls or auditing matters, using one of the methods below:

- Their supervisor or manager;
- Any member of the senior management team;
- Human Resources;
- Their Division General Counsel or Chief Legal Officer;
- Call one of the toll-free anonymous hotlines:
 - English-speaking USA and Canada: 833-620-0070
 - Spanish-speaking USA and Canada: 800-216-1288
 - French-speaking Canada: 855-725-0002
 - All other countries: 800-603-2869 (must dial country access code first);
- Send an email to reports@lighthouse-services.com (must include company name with report);
- Provide a report anonymously at www.lighthouse-services.com/asgn or go to a direct URL for a specific language;
- Fax a report to (215) 689-3885 (must include company name with report); or
- Write the Audit Committee of the Board of Directors:
 - Chairperson of the Audit Committee of the Board of
 - Directors c/o ASGN Incorporated
 - 4400 Cox Road, Suite 110
 - Glen Allen, Virginia 23060

When raising concerns, we ask that employees provide as much detailed information as possible, including the background and history of the concern, names, dates and places where possible, and the reasons why the situation is cause for concern. This is especially important for concerns raised anonymously, so that the Company may conduct an appropriate review and if necessary, begin an investigation.

Please note as well that ASGN does not prohibit anyone from electing to report concerns to, file a charge or complaint with, make lawful disclosures to, provide documents or other information to, participate in an investigation or hearing conducted by or communicate with the Equal Employment Opportunity Commission ("EEOC"), National Labor Relations Board ("NLRB"),

Securities and Exchange Commission (“SEC”) or any other federal, state or local agency charged with the enforcement of any laws.

Additionally, in raising any questions or concerns you may have about potentially illegal conduct, pursuant to the 2016 Defend Trade Secrets Act (“DTSA”), no individual will be held criminally or civilly liable under Federal or State trade secret law for disclosure of a trade secret (as defined in the Economic Espionage Act) that is: (A) made in confidence to a Federal, State, or local government official, either directly or indirectly, or to an attorney, and made solely for the purpose of reporting or investigating a suspected violation of law; or, (B) made in a complaint or other document filed in a lawsuit or other proceeding, if such filing is made under seal so that it is not made public. And, an individual who pursues a lawsuit for retaliation by an employer for reporting a suspected violation of the law may disclose the trade secret to the attorney of the individual and use the trade secret information in the court or arbitration proceeding, if the individual files any document containing the trade secret under seal, and does not disclose the trade secret, except as permitted by court order or arbitration award.

The Company Does Not Tolerate Retaliation

Coming forward with questions or concerns may sometimes feel like a difficult decision, but we are committed to fostering an environment that does not deter individuals from speaking up when they observe conduct that may violate the Code. For that reason, the Company will not tolerate retaliation of any kind because an employee in good faith raises a question or concern about a violation or suspected violation of our Code, our policies, or the laws and regulations under which we do business, or because the employee participates in or cooperates with an investigation of such concerns.

Retaliation is any conduct that would reasonably dissuade an employee from raising, reporting or communicating about good faith concerns through our internal reporting channels or with any governmental authority, or from participating in or cooperating with an investigation or legal proceeding raising such concerns. Retaliation may occur through conduct or written communication and may take many forms, including actual or implied threats, verbal or nonverbal behaviors, changes to the terms or conditions of employment, coercion, intimidation, or deliberate exclusionary behaviors.

The following are examples of potential retaliation the Company prohibits:

- Adverse employment action affecting an employee’s salary or compensation;
- Demotion, suspension, or termination of employment;
- Taking away opportunities for advancement;
- Excluding an employee from important meetings;
- Threatening an employee who has made a report; and
- Directing an employee who has made a report not to report to outside regulators.



It is the Company's policy to adhere to all applicable laws protecting our employees against unlawful retaliation or discrimination as a result of their raising good faith questions or concerns. If you are ever aware of an instance or threat of retaliation, please immediately report it.¹

What ASGN Will Do

When an employee raises a concern, the Company will maintain confidentiality to the extent possible, consistent with applicable legal requirements and the need to conduct an adequate investigation or review. ASGN is committed to reviewing all reported concerns, conducting proper, fair and thorough investigations tailored to the circumstances, and taking appropriate remedial and concluding steps as warranted. All action taken by the Company in response to a concern will necessarily depend on the nature and severity of the concern. This may include initial inquiries and fact-gathering to decide whether an investigation is appropriate and, if so, the form and scope of the investigation. Note that an investigation into concerns raised is not an indication that they have either been confirmed or rejected. The Company complies with the law in conducting investigations and expects that employees will cooperate with an investigation. The Company also expects that employees will provide truthful information when participating in an investigation and, during the investigation, will keep matters related to the investigation confidential.

Remember, all good faith concerns and reports raised under this policy will be taken seriously.

Adherence to This Policy

Employees who believe that they have witnessed, have knowledge of, or have been subjected to any conduct that violates this policy may register a complaint using the procedures outlined above. Any employee who unlawfully discriminates or retaliates against another employee as a result of the employee's protected actions as described in this policy may be subject to corrective action, up to and including termination.

¹ Nothing in this policy prevents the Company from taking appropriate disciplinary or other legitimate employment action consistent with its usual disciplinary practices and the law. In addition, this policy prohibits and does not protect employees who knowingly and intentionally raise false concerns or reports.