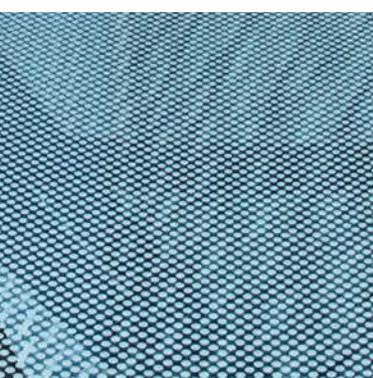




# Global Code of Business Conduct and Ethics

Living Our Core Values Every Day



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**Integrity**

**Collaboration**

**Excellence**

**Integration**

**Entrepreneurship**

# A Message from our CEO



Since Lincoln International was founded in 1996, we have grown from a group of four professionals in Chicago to hundreds of colleagues around the world. This level of growth and accomplishment comes from a commitment to establishing a culture that attracts, empowers, and inspires top talent at all levels of our Firm. Five Core Values have underpinned every strategic and operational decision we have made – and will ensure a bright future for the Firm. Our Core Values are integrity, collaboration, excellence, integration, and entrepreneurship.

Given their inherent importance, our Core Values have become the framework of our Global Code of Business Conduct and Ethics (“Code”). The Code documents the set of principles to guide our behavior in delivery of our services to clients, collaborations with each other, and engagement with outside vendors and partners.

While the Code is many things, its central theme can be summed up as follows: doing the right thing and doing it consistently. Speaking up is especially important in our industry. We encourage everyone to ask questions if something is not clear in the Code. If you suspect anything or anyone is in violation of our Code, our Core Values, Lincoln’s policies, or the law, please speak up. Trust is the foundation of all effective relationships. Direct, honest, and compassionate communication is the best way to establish trust. Dedicate yourself to using your voice and upholding the standards in our Code and you will be **Living Our Core Values Every Day.**

Sincerely,

**Robert Brown**  
Chief Executive Officer

A handwritten signature in black ink that reads "Robert Brown". The signature is fluid and cursive, with a long, sweeping underline that extends to the right.

# Understanding Our Code

## Purpose and Overview

Living our Core Values every day means delivering quality service, holding ourselves and each other accountable, and building a corporate culture for which we can all be proud. It is Lincoln International's ("Lincoln") policy to treat all employees with equity, civility, and respect. In return, Lincoln expects its employees to adhere to standards of conduct and ethics while delivering services to clients, collaborating with each other, and working with outside vendors and partners. It is not enough to succeed commercially in business; we must succeed in ways that are honest, ethical, and fair.

It is incumbent on us all to act with integrity in every action and interaction and make decisions that accurately reflect what we stand for as a Firm. In many situations, the right thing to do may be clear.

However, we understand work can be complicated – so can the laws and rules that apply to us. Sometimes it can be hard to know what to do or where to go for help.

Our Global Code of Business Conduct and Ethics ("Code") is an important resource in this effort. It is designed with you in mind – a vital resource that will help you:

- Promote integrity and the highest standards of ethical conduct.
- Address common ethical situations you may encounter in your work.
- Avoid even the appearance of anything improper in connection with Lincoln's business activities.
- Observe the highest standards of commercial honor and just and equitable principles of trade while conducting business.

## Complying with Laws and Regulations

Lincoln is committed to compliance with all laws, rules, and regulations that apply in each of the jurisdictions in which we operate. It is impossible to anticipate every question you may have or situation you might face. If you are unsure of what to do in a certain situation, you should reach out to a member of Firm Management (Senior Officers, Managing Directors, Functional Heads, or others that supervise individuals on deals or transactions, as defined in **Where to Go: Additional Resources**) or the Compliance, Legal, or Human Resources Departments. As always, we rely on you to use good judgment and to seek help when you need it.

We operate in multiple countries, so it is important to be aware of different laws and customs that may apply. While we respect the norms of our clients, business partners, and co-workers throughout the world, all Lincoln employees must, at a minimum, comply with the standards and principles in this Code. If any provision of our Code conflicts with a local law or requirement, you should seek guidance from the Compliance or Legal Departments.

## Who Must Follow This Code

All employees of Lincoln and its subsidiaries are required to read, understand, and follow our Code.

Consultants, contractors, agents, suppliers, vendors, and temporary employees (“business partners”) who serve as an extension of Lincoln are also expected to follow the spirit of Lincoln’s Code, as well as any applicable contractual provisions.

If you supervise business partners, as defined above, you are responsible for communicating Lincoln standards and ensuring they are understood. If a business partner fails to meet our ethics and compliance expectations or their related contractual obligations, it may result in the termination of their contract.

## Accountability and Discipline

Violating our Code, our Core Values, Lincoln policies, or the law, or encouraging others to do so, exposes our Firm to liability and puts our reputation at risk. If you see or suspect a violation, you may report it through any of the **resources** listed in this Code.

Violating our Code may result in disciplinary action, up to and including termination of employment. In addition, violations of laws or regulations may also result in legal proceedings and penalties including, in some circumstances, criminal prosecution.

## No Rights Created

This Code is a statement of certain fundamental principles, policies, and procedures governing all Lincoln employees and subsidiaries in the conduct of Lincoln’s business. It is not intended to and does not create any rights in any employee, customer, client, visitor, supplier, competitor, shareholder, or any other person or entity.

## One More Thing...

We value your feedback. If you have suggestions for ways to enhance our Code, our Core Values, Lincoln policies, or our resources to better address a particular issue you have encountered, bring them forward to the Compliance Department. Promoting an ethical workplace is a responsibility we all share.

# Our Responsibilities

Each of us has an obligation to act with integrity, even when this means making difficult choices. Meeting this obligation enables ethical and fair business practices that benefit all.

## Employee Responsibilities

You have a responsibility to:

- Act in a professional, honest, and ethical manner when conducting business on behalf of our Firm.
- Know the information in our Code and the Firm's written policies that apply to your jurisdiction and pay particular attention to the topics that apply to your specific job responsibilities.
- Complete all required employee training in a timely manner and keep up to date on current standards and expectations.
- Promptly report concerns about possible violations of our Code, our Core Values, Lincoln policies, or the law to the Compliance, Legal, or Human Resources Departments.
- Cooperate and tell the truth when responding to an investigation or audit, and never alter or destroy records in response to an investigation or when an investigation is anticipated.
- Respect each other and work together.

## Remember:

No reason, including the desire to meet business goals, should ever be an excuse for violating our Code, our Core Values, Lincoln policies, or the law.

Please also see **Where to Go: Additional Resources** for further information on management's responsibilities relevant to your specific jurisdiction.

## Management's Additional Responsibilities

Lincoln Firm Management (as defined in **Where to Go: Additional Resources**) is expected to meet the following additional responsibilities:

- Lead by example. As a member of Firm Management and a role model, you are expected to exemplify high standards of ethical business conduct and make sure anyone who violates them is held accountable.
- Observe the highest standards of commercial honor and just and equitable principles of trade while conducting business.
- Help create a work environment that values mutual respect and open communication.
- Be a resource for others. Communicate often with employees and business partners about how the Code, our Core Values, and Lincoln policies apply to their daily work.
- Be proactive. Look for opportunities to discuss and address ethical dilemmas and challenging situations with others.
- Delegate responsibly. Never delegate authority to any individual whom you believe may engage in unlawful conduct or unethical activities.
- Respond quickly and effectively. When a concern is brought to the appropriate party's attention, treat it seriously and with due respect for everyone involved. Retaliation of any kind is prohibited.
- Be aware of the limits of your authority. Do not take any action that exceeds your authority. If you are ever unsure of what is appropriate (and what is not), discuss the matter with a member of Firm Management or the Compliance, Legal, or Human Resources Departments.
- Proactively keep up to date with any changes in industry regulations.

# Making Good Decisions

Making the right decision is not always easy. There may be times when you will be under pressure or unsure of what to do. Always remember when you have a tough choice to make, you are not alone. There are resources available to help you.

## Facing a Difficult Decision?

It may help to ask yourself:



Is it legal?



Is it consistent with our Code, our Core Values, Lincoln policies, or the law?



Would I feel comfortable if Firm Management and others within my Firm knew about it?



Would I feel comfortable if my decision or my actions were made public?

If the answer to any question is “no” or “I’m not sure,” stop and seek guidance.

Remember, it is always appropriate to ask for help.

## WHAT IF?

**Q:**

**I’m a manager and am not clear on what my obligations are if someone comes to me to report an issue. What if it involves a senior manager?**

**A:**

No matter who the allegation involves, you must report it. Lincoln provides several avenues for reporting concerns. If for any reason you are uncomfortable making a report to a particular person, you may call the **Compliance Hotline**, or reach out to the Compliance, Legal, or Human Resources Departments.

**Q:**

**I observed misconduct in an area not under my supervision. Am I still required to report the issue?**

**A:**

Yes. All Lincoln employees are required to report misconduct. As a leader, you are especially obligated to be proactive. A good approach would be to talk first with the Managing Director or other leader who oversees the area where the problem is occurring. If this is not feasible or effective, you should call the **Compliance Hotline**, or reach out to the Compliance, Legal, or Human Resources Departments.

# Asking Questions and Reporting Concerns

If you see or suspect any violation of our Code, our Core Values, Lincoln policies, or the law, or if you have a question about what to do, you may talk to any member of Firm Management, such as a Senior Officer, Managing Director, Group Head, or Country Head.

However, if you are uncomfortable speaking with a member of Firm Management, there are other resources available to help you:

- Contact another member of Firm Management
- Contact the Compliance Team
- Contact the Legal Team
- Contact Human Resources
- Use the **Compliance Hotline**

Please also see **Where to Go: Additional Resources** for additional information on asking questions and reporting concerns relevant to your specific jurisdiction.

Lincoln will make every reasonable attempt to address your concerns in an impartial, thorough, and efficient manner.

## What to Expect When You Use the **Compliance Hotline** (“Hotline”)

The Hotline web portal and phone line are available 24 hours a day, seven days a week. Trained specialists from an independent third-party provider will answer your call, document your concerns, and forward a written report to Lincoln for further investigation. You may also submit a report online. Lincoln strives for fair and reasonable outcomes in any investigations while protecting those involved.

When you contact the Hotline, you may choose to remain anonymous. All reports received are taken seriously and are of equal importance, whether they are submitted anonymously or not. Any report you make will be kept confidential and retaliation is prohibited. After you make a report, you will receive an identification number to track the status of it. Following up with the identification number is especially important for those who have filed a report anonymously, as we may need additional information. This identification number will also enable you to track the resolution of the case. However, please note out of respect for privacy, Lincoln will not be able to inform you about individual disciplinary actions.

For more detail, please review **Lincoln’s Global Hotline Investigation Procedures**.

WEBSITE:

**[lincolninternational.ethicspoint.com](http://lincolninternational.ethicspoint.com)**

Remember, an issue cannot be addressed unless it is brought to someone’s attention.

Please also see **Where to Go: Additional Resources** for more information on reporting potential misconduct relevant to your specific jurisdiction.

### Examples of reportable offenses include:

- Theft, fraud, embezzlement, falsification, or other acts of dishonesty.
- Any harassment of another employee or business partner (verbal, physical, emotional, or visual), including sexual harassment.
- Obtaining employment or a promotion based on false or misleading information.
- Violating your local gifts and entertainment or travel and expense policies, such as soliciting or accepting gifts above local limits or submitting unauthorized expenses for reimbursement.
- Reporting for work under the influence of alcohol or drugs, other than prescription or over-the-counter medication, as directed. (Note that many of our jurisdictions have separate drug and alcohol policies that should be referenced.)
- Excessive unexcused/unprotected absenteeism or tardiness.
- Unauthorized use of Lincoln or client supplies, information, equipment, funds, or computer codes/passwords.
- Knowingly mishandling a client's or potential client's information.
- Possessing firearms or weapons while on Lincoln premises or carrying them while on Lincoln business; or threatening the personal safety of fellow employees, clients, or vendors.

## Our Non-Retaliation Policy

We are committed to protecting our employees. At Lincoln, we will not tolerate retaliation of any kind against someone who, in good faith, reports actions that may be inconsistent with our Code, our Core Values, Lincoln policies, or the law, or who assists in an investigation of suspected wrongdoing. Reporting "in good faith" means making a genuine attempt to provide honest, complete, and accurate information, even if it later proves to be unsubstantiated or mistaken.

Everyone at Lincoln should strive to discourage and prevent retaliation. Retaliation is a violation of our Code and will result in disciplinary action up to and including termination.

## Waivers and Amendments

On rare occasions, limited waivers of the Code may be necessary. Any requested waiver of this Code should be made to your local Compliance contact, if applicable, or the Senior Counsel and Director, Global Compliance. The Senior Counsel and Director, Global Compliance must approve waivers in writing and the waiver will be promptly disclosed as required by applicable laws, rules, and regulations.

## WHAT IF?

### Q:

**I suspect there may be some unethical behavior going on in my industry group involving a Managing Director. I know I should report my suspicions, and I'm thinking about using the Compliance Hotline, but I'm concerned about retaliation.**

### A:

You are required to report misconduct and using the **Compliance Hotline** is a good option. We will investigate your suspicions. After you make the report, if you believe you are experiencing any retaliation, you should report it, and we will open a separate investigation. Even if the underlying complaint is unsubstantiated, if the retaliation is substantiated, the retaliator will be subject to discipline up to and including termination.

# Our Core Values Overview

## What are Lincoln's Core Values?

### Integrity

#### **Honesty**

- You are known for truthfulness and directness
- You do what is right, even when it is unpopular
- You conduct business ethically and responsibly in compliance with laws, rules, and regulations

#### **Self-Awareness**

- You are non-political when you disagree with others
- You strive to be aware of how your decisions or actions affect others
- You lead with your strengths and recognize your weaknesses, all while making efforts to improve
- You know your limits and prioritize self-care
- You make every effort not to let your mood negatively impact those around you

#### **Accountability**

- You only say things about colleagues you will say to their faces
- You are quick to admit and learn from mistakes
- You are dependable, on time, and prepared – you do not waste other people's time or your own
- You both outline and live up to expectations

# Collaboration

## Selfless

- You seek what is best for Lincoln, rather than what is best for yourself or your group
- You make time to support and develop colleagues
- You do not wait for opportunities to help, you create them
- You exhibit personal humility in success and give credit where it is due

## Respectful

- You treat people with respect independent of their status or disagreement with you
- You listen with empathy and ask questions to understand other points of view
- You are not insulting, disparaging, or dismissive of new ideas or opinions
- You accept and encourage individual differences

## Open-Minded

- You are ego-less when searching for the best ideas
- You easily empathize with others and always strive to see things from different perspectives
- You embrace change rather than relying on “the way it has always been done”

# Excellence

## Judgment

- You make wise decisions (people, technical, business, and creative) despite ambiguity
- You identify root causes and move beyond treating symptoms
- You think strategically and can articulate what you are, and are not, trying to achieve
- You smartly separate what must be done well now, and what can be improved later

## Passion

- You inspire others with your thirst for excellence
- You care intensely about Lincoln’s successes
- You are eager to share your authentic self with colleagues
- You celebrate victories and successes
- You are tenacious

## Impact

- You focus on great results rather than on process
- You provide true perspectives internally and externally
- You accomplish amazing amounts of impactful work
- You demonstrate consistently strong performance so colleagues can rely upon you
- You exhibit bias-to-action, and avoid analysis-paralysis

# Integration

## Communicative

- You create real connections both internally and externally
- You listen instead of reacting fast, so you can better understand
- You recognize that what matters is what your audience hears, rather than what you say
- You are articulate in speech and writing
- You maintain calm poise in stressful situations

## Sharing

- You seek to spread and gain knowledge on a global basis, recognizing that collective intelligence is a valuable intangible asset
- You are direct and honest without being affronting
- You are generous with your time, resources, and experiences in an inclusive and equitable way

## Involved

- You are fully engaged in your career
- You seek ways to have a broad impact
- You invest in relationships with your colleagues
- You take action when something is not right
- You are inclusive and respectfully support all forms of diversity

# Entrepreneurship

## Curiosity

- You learn rapidly and eagerly
- You seek to understand our strategy, market, clients, and partners
- You seek to identify and understand ideas that are different from your own
- You contribute effectively outside of your area of specialty

## Ingenuity

- You seek practical solutions to hard problems
- You challenge prevailing assumptions when warranted, and suggest better approaches
- You create new ideas that prove useful
- You keep us nimble by minimizing complexity and finding time to simplify

## Courage

- You act with authenticity and say what you think even if it is controversial
- You make tough decisions without agonizing
- You take smart risks
- You question actions inconsistent with our values
- You “confront the brutal facts” and deal with them as they are, but stay optimistic about finding a solution

# Integrity: Valuing and Following the Law

## Maintaining Data Privacy

We respect the personal information of others. You must follow Lincoln policies and all applicable laws and regulations when collecting, accessing, using, storing, sharing, and disposing of sensitive information. Only use it – and share it with others outside of Lincoln – for legitimate business purposes and in accordance with applicable laws.

Make sure you know the kind of information that is considered personal information. It includes anything that could be used to identify someone, either directly or indirectly, such as a name, home address, email address, phone number, or credit card number. All employees are responsible for knowing the laws and data privacy policies applicable to their jurisdictions. A list of local policies is included in [Where to Go: Additional Resources](#). If you ever encounter any violations of privacy, promptly report them to the Compliance or Legal Departments. Further, it is always advisable to consult with the Compliance or Legal Departments if you have any doubt whether a data privacy policy or law is implicated.

### WATCH OUT FOR

- Failing to shred or securely dispose of sensitive information.
- Using “free” or individually purchased internet hosting, collaboration, or cloud services without input from IT.
- Failing to safeguard your Lincoln-issued laptop or mobile phone such that they could be lost, stolen, or misplaced.
- Allowing third parties to make unauthorized changes to your devices.
- Visiting websites that could be deemed malicious.

## Preventing Insider Trading

We respect every entity's right to protect its material, nonpublic ("inside") information (MNPI), and we comply with insider trading laws. In the course of your business, you may learn confidential information about publicly traded companies. These companies are added to Lincoln's Confidential and Internal Restricted List. Trading securities while aware of inside information or disclosing it to others who then trade ("tipping") is prohibited by various laws. This prohibition includes trading for the following accounts:

- Employee's personal accounts
- Any accounts where you have beneficial interest (including family members' accounts)
- Any other account where you have discretionary authority

Further, unauthorized disclosure of MNPI even if there is no personal gain is against Lincoln policies and could violate local law.

### Material Information

Material information is information a reasonable investor would take into consideration when deciding whether to buy or sell a security. When determining whether information is material, authorities act with 20/20 hindsight, so it is best to err on the side of caution.

#### Some examples of information about a company that may be material are:

- A proposed acquisition or sale of a business
- A significant expansion or cutback of operations
- A significant product development or important information about a product
- Extraordinary management or business developments
- Changes in strategic direction such as entering new markets

### DO THE RIGHT THING

- Do not buy or sell securities of any company when you have MNPI about that company.
- Protect MNPI from disclosure to the general public, including information in both electronic form and in paper copy.
- Discuss questions or concerns about insider trading with the Compliance Department.

### WATCH OUT FOR

- Requests from friends or family for information about companies with which we do business or have confidential information. Even casual conversations could be viewed as illegal "tipping" of inside information.
- Sharing MNPI with anyone, either on purpose or by accident. Giving this information to anyone else who might make an investment decision based on your inside information is considered "tipping" and is against the law regardless of whether you benefit from the outcome of their trading.

For more detail, please review your local policies on insider trading, including the [U.S. Compliance and Supervisory Procedures Manual](#).

# Enforcing Anti-Corruption and Anti-Bribery Requirements

We believe all forms of bribery and other corrupt practices are an inappropriate way to conduct business regardless of local customs.

Lincoln is committed to complying with all applicable anti-corruption laws prohibiting bribery of government officials, including the **U.S. Foreign Corrupt Practices Act** (“FCPA”), the **U.K. Bribery Act of 2010**, and other applicable anti-bribery laws. We do not give, offer, promise, or accept bribes or kickbacks, at any time for any reason, to a government official. Because serious civil, criminal, and regulatory penalties could be incurred, this prohibition applies equally to any person or third party who represents Lincoln. Third-party relationships present potential bribery and corruption risks. Authorizing a third party to do something that you cannot directly do is a violation of the Code. Lincoln is potentially responsible for the actions of third parties where we know, or consciously disregard a high probability that the third party will offer or make a bribe. We are obligated to monitor the conduct of third parties who perform acts on our behalf and pay special attention to their interactions with government officials.

## Key Definitions

**Bribery** means giving, offering, promising, or accepting anything of value to obtain a business, financial, or commercial advantage.

**Corruption** is the abuse of an entrusted power for private gain.

**Facilitation payments** are typically small payments to low-level government officials intended to encourage them to perform their responsibilities.

**Government officials** include government employees, political parties, candidates for office, employees of public organizations, and government-owned entities. Be mindful that some of our clients could be state-owned and/or have executives that are also government officials.

For more detail, please review **[Lincoln’s Global Anti-Bribery and Anti-Corruption Policy](#)**.

# Antitrust and Fair Competition

We believe in free and open competition and prohibit engaging in practices limiting competition or trying to gain competitive advantages through unethical or illegal business practices. Antitrust laws are complex and compliance requirements can vary depending on the circumstances, so seek help from the Compliance or Legal Departments with any questions about what is appropriate and what is not. Additionally, you should advise the Compliance or Legal Departments if you believe your clients are engaging in behavior that may violate antitrust laws.

**In general, the following activities are red flags, should be avoided, and, if detected, reported to the Legal or Compliance Departments:**

- Sharing Lincoln's sensitive information with a competitor unless authorized by the Compliance or Legal Departments.
- Do not enter into agreements with competitors or others to engage in any anti-competitive behavior, including setting prices or dividing up clients or markets.
- Sharing our clients' or other third parties' sensitive information with their competitors unless it is in conjunction with an active deal transaction where the competitor is a counter-party or potential counter-party and a non-disclosure agreement is in place.
- Attempting to obtain nonpublic information about competitors from new hires or candidates for employment.

## WATCH OUT FOR

- **Collusion** – when companies secretly communicate or agree on how they will compete. This could include agreements or exchanges of information on pricing, terms, wages, or allocations of markets.
- **Bid-rigging** – when competitors or service providers manipulate bidding so that fair competition is limited. This may include comparing bids, agreeing to refrain from bidding, or knowingly submitting noncompetitive bids.
- **Tying** – when a company with market power forces clients or customers to agree to services or products that they do not want or need.
- **Predatory pricing** – when a company with market power sells a service below cost to eliminate or harm a competitor, with the intent to recover the loss of revenue later by raising prices after the competitor has been eliminated or harmed.

# Anti-Money Laundering (“AML”)

Money laundering is a global problem with far-reaching and serious consequences. It is defined as the process of moving funds gained from illegal activities through a legal business to make the funds appear legitimate. Involvement in such activities undermines our integrity, damages our reputation, and can expose our Firm and the individuals involved to severe sanctions.

We are committed to preventing money laundering and complying with all AML, financial crimes, and anti-terrorism laws wherever we operate. You must report any suspicious financial transactions and activities to the Compliance or Legal Departments.

## Money laundering activities may occur in the following three stages:

- **Placement:** introducing illicit funds into the financial system.
- **Layering:** conducting transactions designed to hide the source of the illicit funds.
- **Integration:** moving illicit funds (typically after they have been layered) from the financial system as apparently legitimate funds.

## WATCH OUT FOR

- A client is resistant to (or refuses) Lincoln’s requests to verify their identity, their source of funds, or source of wealth.
- A client has an excessively complex ownership structure for its business.
- The economic rationale for a transaction is unclear or does not make sense when viewed objectively.
- A transaction is proposed that is not on financially commercial terms.
- A transaction is unusual in size, scale, or scope.
- The subject matter, industry, or territorial scope of a transaction is significantly outside the client’s existing portfolio of interests or expertise.
- The client (or a person associated with the client) has a questionable background or is the subject of news reports indicating possible criminal, civil, or regulatory violations.
- A client wishes to proceed with a transaction with unnecessary speed.
- A client offers Lincoln a fee that is outsized in relation to the requested work or offers Lincoln a significantly increased fee for completing a transaction quickly.
- A client has hired and then dismissed several advisors, or several advisors have resigned, in a short time span.
- A client wishes Lincoln to take instructions from, or Lincoln unexpectedly receives instructions from, an uninvolved third party.
- A client wishes Lincoln to receive funds from a third party for Lincoln’s services.

For more detail, please review your local AML policies, found in [Where to Go: Additional Resources](#) and [Lincoln’s Global Know Your Client Policy](#).

## Cooperating with Investigations and Audits

On occasion, employees will be asked to participate in internal and external investigations and audits. Employees must fully cooperate with all such requests and ensure any information they provide is true, accurate, and complete.

Employees may also receive inquiries or requests from government officials. If you learn of a potential government investigation or inquiry, immediately notify the Compliance or Legal Departments before communicating with the government agency, including taking or promising any action.

### WATCH OUT FOR

- **Falsified information.** Never destroy, alter, or conceal documents in anticipation of or in response to a request for these documents.
- **Unlawful influence.** Never provide or attempt to influence others to produce incomplete, false, or misleading statements to an internal or external investigator or auditor.

# Collaboration: Fostering a Respectful and Safe Workplace

## Diversity, Equity, and Inclusion

Lincoln helps bring together employees with a wide variety of backgrounds, skills, and cultures. Combining such a wealth of talent and resources creates the diverse and dynamic teams that consistently drive our results. We seek to foster an inclusive and respectful workplace and encourage our employees to participate in Lincoln's Diversity, Equity, and Inclusion ("DEI") programs offered in our various geographies. This can be fully referenced in our [DEI Policy](#).

Our colleagues, job applicants, and business partners are entitled to receive respect from others. We are committed to creating an environment where they feel welcomed and valued and are given opportunities to grow, contribute, and develop professionally. To uphold that commitment, we support laws prohibiting discrimination and provide equal opportunity for employment, income, and advancement in all our departments, programs, and worksites.

This means we base employment decisions solely on qualifications, demonstrated skills, and achievements – not on race, ethnicity, religion, sex (including pregnancy, sexual orientation, or gender identity), medical condition, national origin, age, disability, genetic information, veteran status, education, political beliefs, citizenship, marital or familial status, language, physical and mental ability, socio-economic status, or any other characteristic protected by law.

### DO THE RIGHT THING

- Treat others respectfully and professionally.
- Promote diversity in hiring and other employment decisions.
- Do not discriminate against others based on any characteristic protected by law or Firm policy.

### WATCH OUT FOR

- Comments, jokes, or materials, including emails, which others might consider offensive, disrespectful, or violates our commitment to DEI.
- Unconscious bias when judging others. If you supervise others, judge them on performance. Use objective, quantifiable standards and avoid introducing unrelated considerations into your decisions.

## WHAT IF?

### Q:

**One of my co-workers sends emails containing jokes and derogatory comments about certain nationalities. They make me uncomfortable, but no one else has spoken up about them. What should I do?**

### A:

Notify a member of Firm Management, Human Resources, or the [Compliance Hotline](#). Sending these kinds of jokes violates our Core Values as well as our standards on diversity, harassment, and discrimination. By doing nothing you may be condoning the discrimination and tolerating beliefs that can seriously erode the team environment we have all worked to create.

# Harassment-Free Workplace

We all have the right to work in an environment free from intimidation, harassment, bullying, and abusive conduct. Verbal or physical conduct by any employee that harasses another, disrupts another's work performance, or creates an intimidating, offensive, abusive, or hostile work environment will not be tolerated.

## Sexual Harassment

A common form of harassment is sexual harassment, which may occur when:

- Requests for a date, a sexual favor, or other similar conduct of a sexual nature are made as a condition of employment or used as the basis for employment decisions.
- An intimidating, offensive, or hostile environment is created by any unwanted verbal, non-verbal, or physical conduct of a sexual nature including sexual advances, insulting jokes, indecent exposure, humiliation, or other offensive verbal, non-verbal or physical behavior of a sexual nature.
- Offensive gestures, jokes, touching, or comments of a sexual nature made to or about an employee, client, or other third-party business partner.

## WHAT IF?

### Q:

**While on a business trip, a colleague of mine repeatedly asked me out for drinks and made comments about my appearance that made me uncomfortable. We weren't in the office, and it was after regular working hours, so I wasn't sure what I should do. Was that harassment?**

### A:

Yes, it was. This type of conduct is not tolerated, not only during working hours but in all work-related situations, including business trips and retreats. You do not have to be on the corporate premises to be a victim of sexual harassment. Tell your colleague such actions are inappropriate and must be stopped and report the problem.

## DO THE RIGHT THING

- Promote a positive attitude toward policies designed to build a safe, ethical, and professional workplace.
- Help each other by speaking out when a co-worker's conduct makes others uncomfortable.
- Demonstrate professionalism. Do not visit inappropriate internet sites or display sexually explicit or offensive pictures.
- Report all incidents of harassment and intimidation that may compromise our ability to work together and be productive.

## WATCH OUT FOR

- Threatening remarks, obscene phone calls, stalking, or any other form of harassment.
- Sexual harassment or other unwelcome verbal, non-verbal, or physical conduct of a sexual nature.
- The display of sexually explicit or offensive pictures or other materials.
- Sexual or offensive jokes or comments (explicit or by innuendo) and leering.
- Verbal abuse, threats, or taunting.

For more detail, please review your jurisdiction's Human Resources policies: [\*\*Where to Go: Additional Resources\*\*](#).

## WHAT IF?

### Q:

**I frequently hear a colleague making derogatory comments to another co-worker. These comments make me feel uncomfortable, but I feel like it is none of my business, and the person they're directed at will speak up if they are offended. Should I ignore this?**

### A:

No, you should not. It is up to each of us to help maintain a work environment where people feel welcomed, safe, valued, and included. Since you are aware of this situation, you have a responsibility to speak up about it. If you feel you can, speak to your colleague and ask that this behavior stop. If you feel you cannot or the comments continue, talk to a member of Firm Management, the Compliance, Legal, or Human Resources Departments, or make a report to the [\*\*Compliance Hotline\*\*](#).

## Health and Safety

Ensuring our employee's health and safety is an integral part of everything we do. Each of us is responsible for acting in a way that protects ourselves and others. No matter what job you do or where you do it, we count on every employee to actively promote a healthy and safe workplace, and report any situations that may pose a health, safety, or security risk.

Reporting risks and hazards is not just the right thing to do, it is a requirement. Failure to speak up about an incident, or participate in an investigation into an incident, may have serious repercussions for you, our Firm, and every Lincoln employee.

### Alcohol and Drugs

While at work or on Lincoln business:

- You should always be ready to carry out your work duties – never impaired.
- Do not use, possess, or be under the influence of alcohol or any substance that could interfere with a safe and effective work environment or harm our Firm's reputation.

### Workplace Violence

Violence of any kind has no place at Lincoln.

We will not tolerate:

- Intimidating, threatening, or hostile behavior.
- Causing physical harm or injury to another; or attempts to do so.
- Acts of vandalism, arson, sabotage, or other criminal activities.
- The carrying of firearms or other weapons on Firm or client property.

## DO THE RIGHT THING

- Follow the safety, security, and health rules and practices that apply to your job and jurisdiction.
- Maintain a neat and safe working environment by keeping workstations, aisles, and other workspaces free from obstacles, wires, and other potential hazards.
- Speak up! Notify a member of Firm Management, the Compliance, Legal, or Human Resources Departments, or make a report to the **Compliance Hotline** immediately about any situation that could pose a threat to health or safety or damage the environment. As an employee, you have the right and the responsibility to stop any work if you feel your safety is at risk.
- Cooperate with all investigations into incidents.
- Stay up to date with the emergency procedures corresponding to your office location.

## WATCH OUT FOR

- Unsafe practices or work conditions.
- Carelessness in enforcing security standards, such as facility entry procedures and password protocols.

For more detail, please review your jurisdiction's Human Resources policies: **Where to Go: Additional Resources**.

## WHAT IF?

**Q:**

**I've noticed some practices in my area that don't seem safe. Who can I speak to? I'm new here and don't want to be considered a troublemaker.**

**A:**

Discuss your concerns with a member of Firm Management or the Compliance, Legal, or Human Resources Departments. There may be very good reasons for the practices, but it is important to remember raising a concern about safety does not make you a troublemaker, but a responsible employee concerned about the safety of others without fear of retaliation.

**Q:**

**A third-party business partner commits a violation of our standards. Are vendors expected to follow the same health, safety, and security policies and procedures as employees?**

**A:**

Absolutely. The employee responsible for supervising a vendor or other business partner working on Lincoln premises must ensure the partner understands and complies with all applicable laws and regulations governing the facility, as well as additional requirements Lincoln may impose.

# Excellence: Adhering to the Highest Standards

## Service Quality and Stewardship

We are dedicated to earning and maintaining the trust of our clients by ensuring the quality of our services. Each of us, as well as our business partners, are expected to meet our clients' service quality expectations.

### DO THE RIGHT THING

- Adhere to the highest standards and never take shortcuts or make exceptions that could compromise the quality of our services.
- Do your part to ensure complete and accurate quality testing and performance reporting.
- Routinely check processes to ensure they conform to specifications and expectations – work toward continuous improvement.

## Conflicts of Interest

A conflict of interest can occur whenever you have a competing interest or activity that may interfere with your ability to make an objective decision on behalf of Lincoln. You are expected to use good judgment and avoid situations that can lead to even the appearance of a conflict, because the perception of a conflict can undermine the trust others place in Lincoln and damage our reputation. It is always a conflict of interest for you to work simultaneously for Lincoln and a competitor.

Conflicts of interest may be actual, potential, or even a matter of perception. Since these situations are not always clear-cut, you need to fully disclose them to a Managing Director working on the transaction, another member of Firm Management, or the Compliance or Legal Departments so they can be properly evaluated, monitored, and managed. You must always actively do what is right.

**Be alert to situations, including the following, which are common examples of potential conflicts of interest:**

### **Corporate Opportunities**

If you learn about a business opportunity because of your job, its ownership lies with Lincoln. This means that you are prohibited from directly or indirectly benefiting from (or taking) that opportunity for yourself unless you get approval from a member of Firm Management and the Compliance or Legal Departments. You are prohibited from competing with Lincoln for any business opportunities and from using Lincoln's property, information, or positions for personal gain.

### **Friends and Relatives**

On occasion, it is possible you may find yourself in a situation where you are working with a close friend or relative who works for a client, business partner, competitor, or even our Firm. Since it is impossible to anticipate every scenario that could create a potential conflict, you should disclose your situation to a Managing Director working on the transaction or another member of Firm Management to determine if any precautions need to be taken.

### **Civic Activities**

Unless Firm Management specifically asks you to do so, or the position is approved in accordance with Lincoln policies prior to beginning, you should not accept a seat on the board of directors or advisory board of any of our competitors, business partners, or clients, especially if your current job gives you the ability to influence Lincoln's relationship with them.

## **DO THE RIGHT THING**

- Always make business decisions in the best interest of Lincoln.
- Think ahead and proactively address situations that may put your interests or those of a family member in a potential conflict of interest with Lincoln.
- Discuss with Firm Management or the Compliance or Legal Departments the full details of any situation that could be perceived as a potential conflict of interest.

## **Obligation to Disclose**

As Lincoln operates in a regulated industry, it may have the obligation to report certain background information on employees to the relevant regulatory body, no matter the jurisdiction in which the employees reside. Thus, all Lincoln employees must notify the Compliance Department if they:

- Have been accused of any criminal offense or have been arrested, arraigned, or have entered a plea.
- Have been disciplined or investigated by any regulator or professional organization.
- Are named in litigation involving employment with Lincoln.
- Have been prohibited from engaging in any conduct relating to securities, commodities, insurance, or banking matters, either temporarily or permanently, by any applicable court or government agency.
- Have been the focus of client complaints.
- Become subject to liens and/or bankruptcy.

## **WHAT IF?**

**Q:**

**I think there may be an issue with one of the methodologies my group uses, but we are behind schedule and if I say anything, we will be delayed further as my group leadership investigates. What should I do?**

**A:**

Lincoln never sacrifices quality to meet a Firm deadline or target. You should report the matter immediately to your group leadership. If you believe your concerns are not being addressed, you should report the matter to the Compliance or Legal Departments.

# Integration: Collectively Protecting Our Information and Assets

## Our Firm's Assets

Each of us is entrusted with corporate assets – the resources we own (whether tangible or intangible) that enable us to operate. We are personally responsible for using them with care and protecting them from fraud, waste, and abuse. Personal use of Firm assets is discouraged, but where permitted, should be kept to a minimum, have no adverse effect on productivity and the work environment, and should not be used for financial gain.

### Physical and Electronic Assets

Physical assets include Lincoln facilities, materials, and equipment. Electronic assets include computer and communication systems, software, and hardware. Files, records, documents, letters, memoranda, reports, data, sketches, drawings, models, program listings are also Firm assets, and we have a responsibility to ensure their confidentiality, security, and integrity.

Be aware any information you create, share, or download onto Firm systems belongs to Lincoln, and the Compliance or Legal Departments may have the right to review and monitor system use at any time, without notifying you, to the extent permitted by your local law.

## DO THE RIGHT THING

- Use Firm assets to only carry out your job responsibilities, never for activities that are improper or illegal.
- Observe good physical security practices, especially those related to badging in and out of our facilities with only your access card.
- Be a good steward of our electronic resources and systems, and practice good cybersecurity:
  - Do not share passwords or allow other people, including friends and family, to use Lincoln resources.
  - Only use software that has been properly licensed. The copying or use of unlicensed or “pirated” software on Firm computers or other equipment to conduct Firm business is strictly prohibited. If you have any questions about whether a particular use of software is licensed, contact the IT Support Department.
  - Beware of phishing attempts. Use caution in opening email attachments from unknown senders or clicking on suspicious links and always alert the IT Department when you think you may have received a phishing email.
  - Do not share your laptop with anyone.
- Follow the same rules working remotely that you would while in the office as the increased use of technology creates a rise in risk.
  - Lock your workstation when you step away and log off our systems when you complete your work for the day, even when working remotely.
  - For sensitive matters, make a phone call. Do not use internal messaging tools or text messaging. Just because this form of communication is instantaneous, does not mean your responses have to be. Assume that anything put in writing could become public.

## WATCH OUT FOR

- Requests to borrow or use Lincoln equipment without approval.
- Excessive use of Lincoln resources for personal purposes.
- Unknown individuals without proper credentials entering our facilities.

# Confidential Information and Intellectual Property

Lincoln relies on each of us to be vigilant and protect confidential information and intellectual property – some of our most important and valuable assets. This means keeping this information secure, limiting access to those who have a need to know to do their job, and only using it for authorized purposes.

Be aware that your obligation to restrict your use of Lincoln’s proprietary information and intellectual property continues even after your employment ends.

## Intellectual Property

Examples of intellectual property (IP) include:

- Business and marketing plans
- Brands and logos
- Firm initiatives (existing, planned, proposed, or developing)
- Client or target lists
- Unpublished financial information

## DO THE RIGHT THING

- Use and disclose confidential information only for legitimate business purposes.
- Protect Lincoln’s intellectual property and confidential information by sharing it only with authorized parties or when legally mandated.
- Only store or communicate Firm information using Lincoln information systems.
- Save files in shared drives where possible and do not delete anything unless it is in accordance with your local records management policy.

## WATCH OUT FOR

- Discussions of Lincoln or client confidential information in places where others might be able to overhear – for example on airplanes, elevators, at home, in restaurants, and when using telephones.
- Using laptops in public locations without taking the necessary precaution of a privacy screen, especially when working on sensitive or confidential documents.
- Sending confidential information to unattended devices or printers whether at the office or remotely.
- Trademarks or logos being used in an offensive manner.

# Accurate Recordkeeping

The accuracy and completeness of our disclosures and business records are essential to making informed decisions and working with investors, regulators, and others. Our books and records must accurately and fairly reflect our transactions in sufficient detail and in accordance with our accounting principles, practices, policies, and internal controls. Falsifying Firm documents or records, including misuse of timekeeping records is prohibited.

Some employees have special responsibilities in this area, but all of us contribute to the process of recording business results or maintaining records. Ensure that the information we record is accurate, timely, complete, and maintained in a manner consistent with your jurisdiction's legal and regulatory obligations as well as our internal controls. Should you believe there is a questionable auditing or accounting situation you can, in good faith, report it to the Finance, Compliance, or Legal Departments, or make a report to the [\*\*Compliance Hotline\*\*](#).

## Records Management

Documents should only be disposed of in compliance with local law and Lincoln policies. You must never conceal wrongdoing or permit others to do so. Never destroy documents in response to, or in anticipation of, litigation, an investigation, or an audit.

If you have any questions or concerns about retaining or destroying corporate records, please contact the Compliance or Legal Departments.

## DO THE RIGHT THING

- Create business records that accurately reflect the truth of the underlying event or transaction.
- Be guided by the principles of transparency and truthfulness.
- Write carefully in all your business communications. Write as though someday the records you create may become public documents.

## WATCH OUT FOR

- Records that are not clear and complete or that obscure the true nature of any action.
- Undisclosed or unrecorded funds, assets, or liabilities.
- Improper destruction of documents.

# Responsible Communications

Lincoln is committed to maintaining honest, professional, and lawful internal and external communications that abide by our regulatory requirements as well as our ethical standards.

We need a consistent voice when making disclosures or providing information to the public. For this reason, each of us must help the Firm ensure only authorized persons speak on behalf of Lincoln. Refer any communications with the media, investors, stock analysts, and other members of the financial community to the Chief Marketing Officer (“CMO”). The CMO, or a member of their team, must also approve all Lincoln logo uses and testimonials regarding Firm services.

As Lincoln communications are regulated in certain jurisdictions, those employees are obligated to review the specific communications rules applicable to their jurisdiction. All global employees must be aware that U.S. employees are not permitted to use non-Lincoln-approved apps or programs for business communications.

## Full, Fair, and Timely Disclosures

Lincoln is committed to meeting its obligations of full, fair, and timely disclosures in all reports and documents that describe our business and financial results, and other public communications.

## WATCH OUT FOR

- Giving public speeches or writing articles for professional journals or other public communications that relate to Lincoln without approval from the CMO.
- Invitations to speak “off the record” to journalists or analysts who ask you for information about Lincoln or its clients and/or business partners.

## Social Media

To use social media for business purposes you must utilize posts from SocialHP. All new user registrations to SocialHP are reviewed and approved by the marketing team prior to accessing the platform. If you participate in internet discussion groups, chat rooms, bulletin boards, blogs, social media sites, or other electronic communications, even under an alias, never give the impression that you are speaking on behalf of Lincoln.

- If you believe a false or unethical statement about our Firm has been posted, do not post, or share nonpublic information, even if your intent is to “set the record straight.” Your posting might be misinterpreted, start false rumors, or may be inaccurate or misleading. Instead, contact the CMO and the Compliance Department. In general, all oral or written communications must be:
  - truthful, balanced, and in good taste;
  - must not omit material facts; and
  - must not use language that is misleading, promissory, or exaggerated.

For more details on the rules governing the protection of Lincoln information and assets, please review your local policies listed in [Where to Go: Additional Resources](#).

# Entrepreneurship: Demonstrating Leadership Everywhere

## Human Rights

We conduct our business in a manner that respects the human rights and dignity of all, and we support international efforts to promote and protect human rights, including an absolute opposition to slavery and human trafficking.

Each of us can help support efforts to eliminate abuses such as child labor, slavery, exploitation, human trafficking, and forced labor.

### DO THE RIGHT THING

- Report any suspicion or evidence of human rights abuses in our operations or in the operations of our clients or business partners.
- Remember, respect for human dignity begins with our daily interactions with one another, our business partners, and our clients. It includes promoting and nurturing diversity and doing our part to protect the rights and dignity of everyone with whom we do business.

## WHAT IF?

### Q:

**When I was visiting a new client, I noticed employees working there who seemed underage. When I asked about it, I didn't get a clear answer. What are my next steps?**

### A:

You did the right thing to be on the lookout for human rights abuses and to raise the issue with our client. The next step is to report the incident to the Compliance or Legal Departments or make a report to the **Compliance Hotline**. We are committed to human rights and to the elimination of human rights abuses including child labor.

## Charitable Activities

Lincoln encourages you to make a difference on a personal level, supporting charitable and civic causes that are important to you. Be sure your activities are lawful and consistent with our policies and that you are participating on your own time and at your own expense. Such activities should never interfere with your daily responsibilities. Never pressure your colleagues to participate and, unless you receive approval in advance, do not use Lincoln funds, assets, or the Lincoln name to further your personal volunteer activities.

## Political Activities and Lobbying

Each of us has the right to voluntarily participate in the political process, including making personal political contributions, whether financial, in-kind, or volunteer, to domestic or foreign campaigns for public office. However, you must always make clear that your personal views and actions are not those of Lincoln, and never use Firm funds, time, or the Lincoln name for any political purpose without proper authorization.

### DO THE RIGHT THING

- Ensure that your personal political views and activities are not viewed as those of the Firm.
- Do not use our resources or facilities to support your personal political activities.
- Follow all federal, state, local, and foreign election laws, rules, and regulations as they relate to contributions or expenditures (such as U.S. Pay to Play rules).

### WATCH OUT FOR

- Lobbying. Interactions with government officials or regulators that could be seen as lobbying must be discussed in advance and coordinated with the Compliance or Legal Departments.
- Pressure. Employees should never apply direct or indirect pressure on another employee to contribute to, support, or oppose any political candidate or party.
- Improper influence. Employees should avoid even the appearance of making political or charitable contributions to gain favor or in an attempt to exert improper influence.
- Conflicts of interest. Campaigning for or holding political office must not create or appear to create a conflict of interest with your duties at Lincoln.

For more information, please review the Global Anti-Bribery and Anti-Corruption Policy and your local policies listed in [Where to Go: Additional Resources](#).

## WHAT IF?

### Q:

**I would like to invite an elected official to speak at an upcoming Firm event. Would that be a problem?**

### A:

You must get approval from Firm Management and the Compliance or Legal Departments before inviting an elected official or other government official to attend a Firm event. If the invitee is amid a reelection campaign, the Firm event could be viewed as an endorsement of the candidate. Depending on local laws, any food, drink, or transportation provided to the invitee could be considered a gift. In most cases, there would be limits and reporting obligations.

## Corporate Citizenship

Corporate social responsibility is an integral part of Lincoln's culture. We believe in making a positive difference in people's lives and engaging responsibly in charitable activities to make a positive impact in the communities where we live and work. As a Firm, we contribute funds, time, and talent to support Firm-wide programs and local causes. We encourage (but do not require) you to participate in the many initiatives we support.

## Sourcing Responsibly

Lincoln evaluates and engages with qualified business partners on an objective basis grounded in fairness. When selecting partners, we assess their ability to satisfy our business and technical needs and requirements. All agreements are negotiated in good faith and must be fair and reasonable for both parties. Do your part to hold our business partners to our high standards and ensure they operate ethically, in compliance with the law, and in a way that's consistent with our Code, our Core Values, and our policies.

# In Conclusion: A Message from Lincoln's Chairman

When we formed Lincoln more than twenty-five years ago, we intended to create a great place to work for high performers. As one of the original founders, I am most gratified that one of our earliest objectives remains our highest priority. I am confident our global team of professionals are bound by a shared commitment of living our Core Values and will create and deliver the best possible solutions and service to our clients, and the Firm will succeed as a result. Doing the right thing is assured when the right people are leading the way. I am humbled to work alongside our global team of professionals who operate with integrity, constantly striving to make quality and meaningful contributions for our clients, our global team of professionals, and our communities.

A handwritten signature in black ink that reads "Jim Lawson". The signature is written in a cursive, flowing style.

**Jim Lawson**  
Chairman

# WHERE TO GO: Additional Resources

**Firm Management Definition:** Senior Officers, Managing Directors, Functional Heads, or others that supervise individuals on deals or transactions.

[Compliance Hotline](#)

[Lincoln University](#)

[Global Anti-Bribery and Anti-Corruption Policy](#)

[Global Know Your Client Policy](#)

[Brazil: Employment Legislation](#)

[France: Charter for the use of IT and communication systems \(GDPR\)](#)

[France: Information notice regarding protection of personal data of LI SAS's employees \(GDPR\)](#)

[France: How to handle violations regarding personal data \(GDPR\)](#)

[France: Appendix 1: Report a personal data breach \(GDPR\)](#)

[India: Anti-Bribery and Anti-Corruption \(ABAC\) Policy](#)

[India: Anti-Sexual Harassment Policy](#)

[India: Employee Manual](#)

[India: Equal Opportunity Policy](#)

[Italy: Company General Policies](#)

[Japan: Work Rules](#)

[LIAG: Anti-Money Laundering Compliance Process](#)

[LIAG: Code of Conduct](#)

[LIAG: Principles for Employee Transactions](#)

[Stockholm: Compliance Manual](#)

[Stockholm: Employee Handbook](#)

[United Kingdom: Compliance Manual](#)

[United Kingdom: Employee Handbook](#)

[United States: Benefits Guide](#)

[United States: Communications Policy](#)

[United States: Compliance and Supervisory Manual](#)

[United States: ComplySci](#)

[United States: DEI Policy](#)

[United States: Policy Manual](#)

