

A man and a young child are dancing in a living room. The man, wearing glasses and a patterned shirt, is in a dynamic pose with arms outstretched. The child, wearing a white polo shirt, is also dancing. The background shows a lamp and a window.

software **one** **code of** **conduct**

→ [GO](#)

First thing to know: We're here to help

This Code of Conduct sets the standards we all follow in our work. It helps you make decisions when something feels unclear, uncomfortable, or not right — and supports you in speaking up.

If something concerns you, you can report it via the Integrity Line — all concerns raised in good faith are taken seriously and investigated independently, fairly, confidentially, and in a timely manner.

[Contact Integrity Line](#)

You don't have to be certain to speak up.

Message from the Co-CEOs



Dear all,

The cornerstone of SoftwareOne's success is, and always has been, our firm commitment to our core values. How we act and behave as a company, as teams, and as individuals is integral to maintaining the trust of our customers, partners, and stakeholders. They count on us to always uphold the highest standards of professionalism and integrity.

Our Code of Conduct reflects our identity. It is a guide for making business decisions, a resource for resolving potential conflicts, and above all, our commitment to do the right thing. This Code is not just a set of guidelines; it is the basis of who we are as a company.

If you have questions about our Code or feel that our values are being compromised, please speak up. Whether it's through your leader, our Legal & Compliance team, anonymously through the [Integrity Line](#), or as a message to compliance.global@softwareone.com, do not hesitate to reach out to us.

Thank you for your unwavering dedication to SoftwareOne and for embodying our values every day. It's through your efforts and commitment that we continue to grow and succeed. We are immensely inspired by our achievements and even more excited by what lies ahead.

Best regards,

Raphael Erb and Melissa Mulholland

Co-CEOs, SoftwareOne



Purpose and Scope

This Code of Conduct applies to SoftwareOne all employees, consultants, contractors, sub-contractors, directors, executive officers, and affiliates in which SoftwareOne owns more than 50% of the voting controls. It sets out the principles and standards that guide our actions and decisions in our daily work and serves as a foundation for a positive, productive, and ethical workplace. We expect every team member to uphold these values and help create an environment where respect, integrity, and excellence thrive.

Our Commitment to Ethical and Legal Standards

Our Code is informed by internationally recognized frameworks, including the UN Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, and the ILO Fundamental Conventions. We comply with all applicable laws, such as anti corruption laws, competition and antitrust regulations, trade sanctions and export control rules, data protection laws, and legislation on supply chain transparency and modern slavery. Where this Code sets expectations that exceed local legal requirements, we follow the Code while continuing to meet all applicable laws.





At SoftwareOne our Core Values are who we are. They shape the way we do business and influence how we treat each other and third parties. Our Code of Conduct aligns with each of these values.

Integrity →

We consistently do what's right and build credibility through honesty, transparency, and speaking up.

We share our concerns | We do not tolerate corruption and bribery

Momentum →

We embrace change with resilience, pioneer new solutions, and, together, drive continuous improvement, moving with pace.

We love what we do and protect our Intellectual Property | We take care of our environment | We are accurate with our finances

Passion →

We always aim to go beyond expectations, deliver excellence with a growth mindset.

We avoid conflicts | We use AI responsibly

Accountability →

We take ownership, follow through on commitments, stay humble, and drive real impact.

We protect our assets | We respect export controls | We keep our information confidential | We stand against money-laundering | We respect market competition | We do not trade on insider information

Customer-Focus →

We are driven by customer success, building loyalty and lasting partnerships with all our stakeholders.

We accept and give gifts only if appropriate | We protect our customers' data | We build trusted partnerships

Trust →

We put people at the heart of everything, fostering empathy, empowerment, and respect, in an environment where everyone can thrive.

We are committed | We treat each other fairly, with respect and dignity | We stand for equal and fair opportunities | We communicate kindly and responsibly | We prioritize health and safety

At SoftwareOne, we live our values—Integrity, Momentum, Passion, Accountability, Customer-Focus, and Trust—to create IMPACT.



We share our concerns.

At SoftwareOne, if you see something, say something.

Integrity is at the heart of who we are and guides how each of us acts every day. Acting with integrity means doing the right thing in our own conduct when something doesn't feel right. If you ever have any questions or doubts relating to integrity, our culture, or specific matters relating to our Code of Conduct, do not hesitate to reach out to your leader, People & Culture, or the Legal & Compliance team.

SoftwareOne promotes a 'speak-up' culture and upholds a stringent non-retaliation policy in line with the EU Whistleblower Protection Directive (Directive (EU) 2019/1937) and other relevant local legislation. This means that no one will face any form of reprisal, retribution, or adverse action for raising a good faith concern, making a report, or participating in an investigation. Instances of perceived or actual retaliation should be reported immediately to the Compliance team and/or People & Culture.



Integrity

Momentum

Passion

Accountability

Customer-Focus

Trust

Concerns can include, but are not limited to:

- Breaches of laws or regulations, including anti-bribery, anti-trust, or competition laws
- Fraud, theft, or falsification of records
- Inappropriate behavior, including harassment, abuse of authority, discrimination, or intimidation
- Sharing of insider or non-public information
- Conflicts of interest or undisclosed personal or financial relationships that could influence business decisions
- Breaches of company policies, including our Code of Conduct, Partner Code of Conduct.
- Violations of human rights or labour standards, including unsafe or unfair working conditions

Integrity also means taking action when the Code of Conduct is not respected. You are encouraged to raise concerns directly, or escalate them if needed, so that inappropriate behavior or unethical conduct is addressed promptly. All concerns reported in good faith will be taken seriously and handled confidentially, and investigations will be conducted in a fair, transparent, and timely manner.

Non-compliance or violations of our Code of Conduct may result in disciplinary action, up to and including termination of employment depending on the severity of the offence.

Whistleblower helpline/Grievance mechanism

✉ **E-Mail:** compliance.global@softwareone.com, concerns@crayon.com

☎ **Integrity Line:** <https://softwareone.integrityline.io/>

We do not tolerate corruption and bribery.

Even though we always strive for great customer experience in a timely manner, we sometimes have to take a moment to consider our actions.

A bribe is anything of value that is intended to improperly influence, induce, reward, or secure a decision or advantage. This includes improper payments, kickbacks, facilitation payments, or offers of gifts, entertainment, or other benefits made to or from clients, partners, suppliers, officials, or anyone else.

At SoftwareOne, extortion, bribery and corruption are never acceptable. Even promising or agreeing to an improper payment is considered corrupt behavior, whether or not the payment is ultimately made. We will always support all employees who choose integrity – even when it means losing a deal or an opportunity.

If you feel unsure prior to a meeting or event, don't go alone, bring along a fellow employee or your leader. We do not accept any offers of improper payments, and we expect all employees to always respect applicable anti-bribery laws at all times.

For further guidance, please refer to our Anti-Bribery and Corruption Policy, and consult the Compliance team before taking any action if you are uncertain.





Integrity

Momentum

Passion

Accountability

Customer-Focus

Trust

We love what we do and protect our Intellectual Property.

We are passionate about the solutions we offer, both our own and those of our partners.

Our intellectual property is an important asset. At SoftwareOne, we have many teams creating new products or integrating products and solutions which were obtained through acquisitions. These products are very valuable to SoftwareOne, and we take care in protecting these. If, outside of your employment, you develop or help develop products or solutions using SoftwareOne resources, you could find yourself in a conflict of interest and in a situation that contravenes your employment agreement. In case you are unsure or have questions on intellectual property ownership, please disclose using our [Disclosure Tool](#) or consult Legal & Compliance team.

We are not just committed to protecting our own intellectual property but are also committed to protecting our brands, as well as the intellectual property and the brands of our clients and partners. This means that we safeguard intellectual property, trademarks, service marks, patents, copyrights and trade secrets of SoftwareOne and of our third parties. It is vital to avoid reproducing, distributing or altering copyrighted materials without the permission of the copyright owner or its authorised agents. In addition, any software used in connection with our business must be properly licensed and used only in accordance with that license, as using unlicensed software could constitute copyright infringement.



We take care of our environment.

SoftwareOne is committed to taking steps towards making the world a better place.

At SoftwareOne we strive to minimize our environmental footprint and contribute positively to the preservation of our planet's resources.

We actively integrate sustainable practices into our daily tasks whenever possible, including reducing and eliminating waste of all types; and implementing energy-saving measures like turning off unused equipment and using energy-efficient devices. We encourage and participate in initiatives that promote environmental stewardship within the organization and in the wider community. We measure and report our carbon footprint through our annual greenhouse gas inventory.

We also invite our partners to join us in this mission to improve sustainability efforts.

Additional information is available in our Environmental Policy.



We are accurate with our finances.

We follow discipline to ensure that all financial records and reporting are accurate, timely, and ethical.

We ensure that all financial records and reporting are accurate, complete, timely, and reflect the true nature of our business activities.

Everyone shares responsibility for the integrity of our financial information. If your work involves creating, approving, or recording transactions, you must ensure that information is accurate and not misleading, and that transactions are properly authorised and recorded in line with our policies.

We make financial decisions with integrity and in accordance with our policies and controls. Decisions and reporting must not be influenced by pressure to meet targets or achieve a particular outcome.

We do not alter or omit information, misclassify transactions, or bypass controls. All records must be retained in accordance with applicable requirements. If something does not seem accurate or appropriate, raise it. If you are unsure, seek guidance from your line manager or the Legal & Compliance team.



We avoid conflicts.

Don't let your passions hinder you from acting in SoftwareOne's best interests.

A conflict of interest arises when your actions, relationships, or opportunities - whether perceived or actual - could affect your judgement in doing what is right for SoftwareOne. Examples include family members working at SoftwareOne or with any of our third parties, secondary employment or job opportunities, financial investments or board memberships.

Not all situations constitute a conflict of interest, but by disclosing potential or actual conflicts via the [Disclosure Tool](#), the Compliance team can help you navigate them and avoid allegations of impropriety.





Integrity

Momentum

Passion

Accountability

Customer-Focus

Trust

We use AI responsibly.

Let innovation drive us without putting SoftwareOne, our employees or our customers at risk.

At SoftwareOne, we recognize the transformative potential of AI to accelerate innovation, enhance our solutions, and support our strategic goals. However, we must ensure that any use of AI aligns with our core values and governance framework, and protects the trust placed in us.

The guiding principle for appropriate AI use must be observed at all times. This means: having have a clear business reason for using AI; not sharing confidential, personal, or other sensitive information without authorization or a valid business justification; using approved AI tools; ensuring that human judgement and oversight remain central to every decision; and complying with all SoftwareOne policies. All AI use must avoid creating legal, financial, operational or reputational risk.

For further guidance, please refer to our Artificial Intelligence Governance Policy.



Integrity

Momentum

Passion

Accountability

Customer-Focus

Trust

We protect our physical assets.

Each of us is committed to protecting SoftwareOne assets.

You are provided with all the IT resources you need to do your job, including laptops, internet access and email services, telephones, and similar technologies. These assets, along with all electronic data, applications and web services are owned by SoftwareOne. It is your responsibility to treat these with care and use them appropriately, in support of business operations.

This applies to all company property, from office furniture and IT equipment, and includes smaller items such as access keys or ID badges. Misappropriation of property, or misuse that could cause physical, financial or reputational damage, is strictly prohibited.

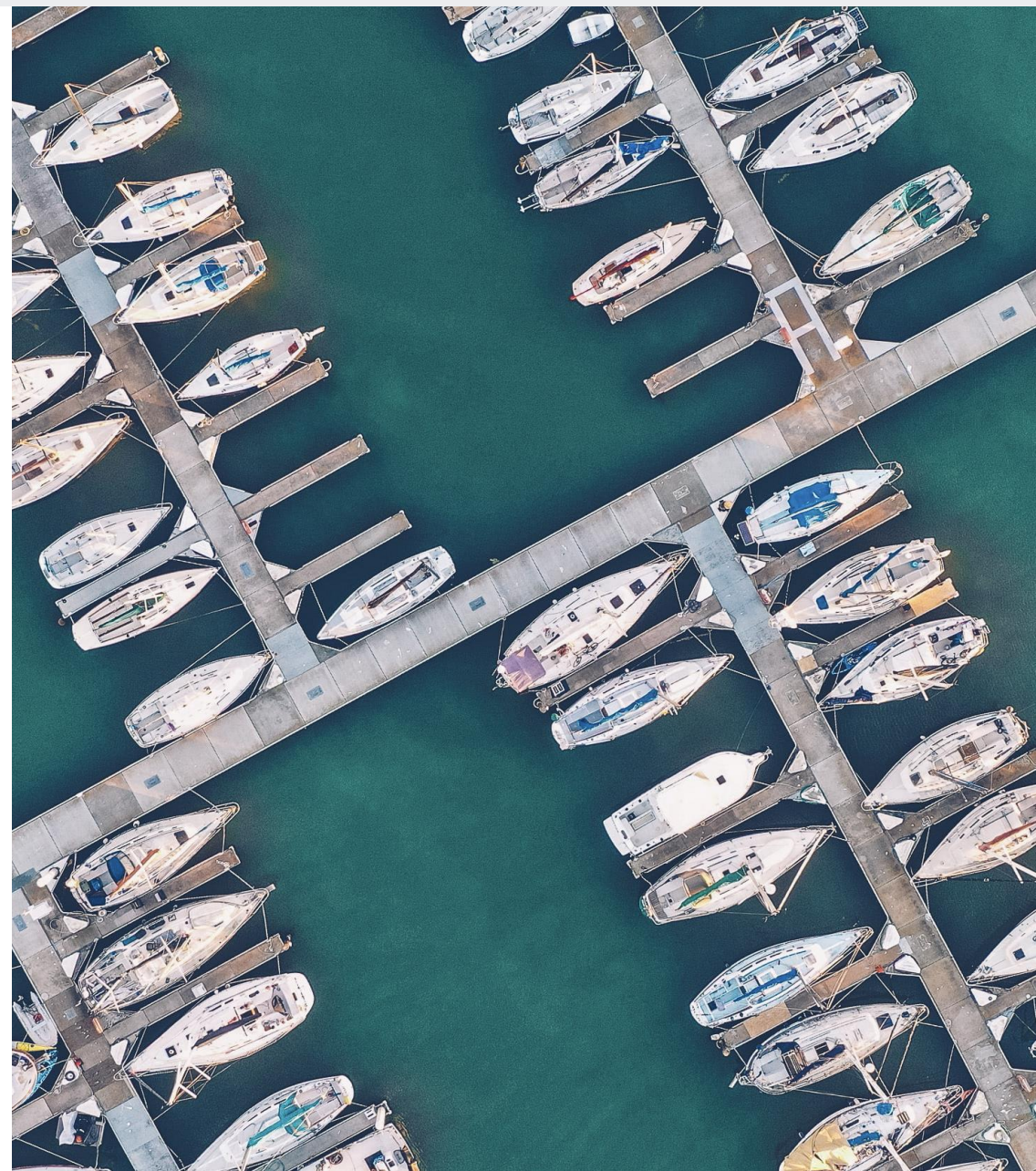


To ensure the appropriate use of company property, all employees must:

- Avoid activities that could reasonably result in physical damage, loss, or risk to others.
- Follow all expected responsibilities and instructions for the use of company property.
- Refrain from sharing property or access with unauthorised individuals.

Examples of inappropriate use include:

- Sharing office keys or access badges without authorization.
- Using company-provided IT resources for personal commercial activities.
- Damaging office furniture or equipment.
- For further guidance, please refer to our respective IT and Solutions Global Policies.



We comply with export controls and trade sanctions.

Know who you do business with, where it goes, and what it's used for.

We comply with all applicable international trade laws, including export controls and economic sanctions. These laws govern the cross-border transfer of goods, software, technology, and services, as well as our interactions with certain countries, entities, and individuals.

Compliance with these requirements is relevant across our business. If your work involves customers, vendors, payments, contracts, or access to goods, software, or technology, you must ensure that your activities comply with applicable restrictions and our internal procedures.

You are expected to exercise care in your day-to-day work. In particular, you must not engage in transactions or activities that involve restricted countries, sanctioned parties, or prohibited end-uses, or that attempt to bypass applicable trade restrictions. You should also be aware that sharing technical data, granting system access, or moving equipment across borders may constitute an export.

Trade restrictions imposed by jurisdictions such as the United States, the European Union, and the United Kingdom may apply to our operations, regardless of where we are located.

If you are unsure whether a transaction or activity is permitted, do not proceed and seek advice from the Legal & Compliance team.





Integrity

Momentum

Passion

Accountability

Customer-Focus

Trust

We keep our information confidential.

Sharing information in a hurry can be detrimental.

As an employee you are entrusted with a lot of information of varying sensitivity, some of this data will be confidential and could include trade secrets, business plans or outlooks, financial data, pricing, customer details, new products, agreements with suppliers, internal communications, and information relating to legal proceedings or disputes. It is everyone's responsibility to ensure that such information stays inside SoftwareOne, and that it is only shared with those who are authorised. Even if you choose to leave us, restrictions remain on disclosing information that is not publicly available. For further guidance, please refer to our [Information Security Policy](#).

We stand against money laundering.

Take your time to understand who you are dealing with.

Money laundering is defined as any financial or economic transaction intended to introduce illegally acquired funds into the legal financial system. We only cooperate with honest and trustworthy business partners and will immediately terminate any business relationship if we become aware that a company is involved in such activities. As an employee, you must always comply with applicable local laws and promptly inform your leader or Legal & Compliance team of any suspicious transactions or behavior.



Integrity

Momentum

Passion

Accountability

Customer-Focus

Trust

We respect market competition.

We should not forget the importance of competition. We are here to help our customers have more choices at the best prices.

At SoftwareOne we encourage ethical and fair business practices. Competition, antitrust laws and regulations are designed to prohibit conduct that may damage fair competition. This means we do not allow agreements or undertakings among competitors, whether express or implied, that fix prices, limit production, allocate markets, or otherwise restrict competition. This can be anything, even a 'tip' from someone sharing information concerning pricing, production capacity, marketing plans, and related matters with competitors, as well as certain anticompetitive practices involving suppliers or customers. You must comply with applicable competition laws and act responsibly to protect the integrity of SoftwareOne and maintain trust with customers, partners, and regulators.

We do not trade on insider information.

Regardless of your insight and role at SoftwareOne, any key information that is not public, even a 'tip' or guidance, must not be disclosed. At SoftwareOne you may receive or overhear information that could impact the value of SoftwareOne shares. Using such non-public information to buy or sell shares, or to pass on to others, could constitute insider trading, which is illegal. This information also applies to any company with which your role engages, such as vendors, customers, or suppliers. Even the appearance of an improper transaction must be avoided. For further guidance, please refer to our Internal Regulations Against Insider Trading.

We accept and give gifts only if appropriate.

We work hard to build strong customer and partner relationships, but we must ensure that any gift, benefit, or hospitality given or received is appropriate and aligned with our ethical standards. All gifts received from customers, partners, or third parties must be in line with the established approval thresholds and local requirements, and the same applies to any gifts or courtesies we offer. When in doubt about a gift's value or appropriateness, whether giving or receiving, seek guidance from your leader or disclose it through the [Disclosure Tool](#).

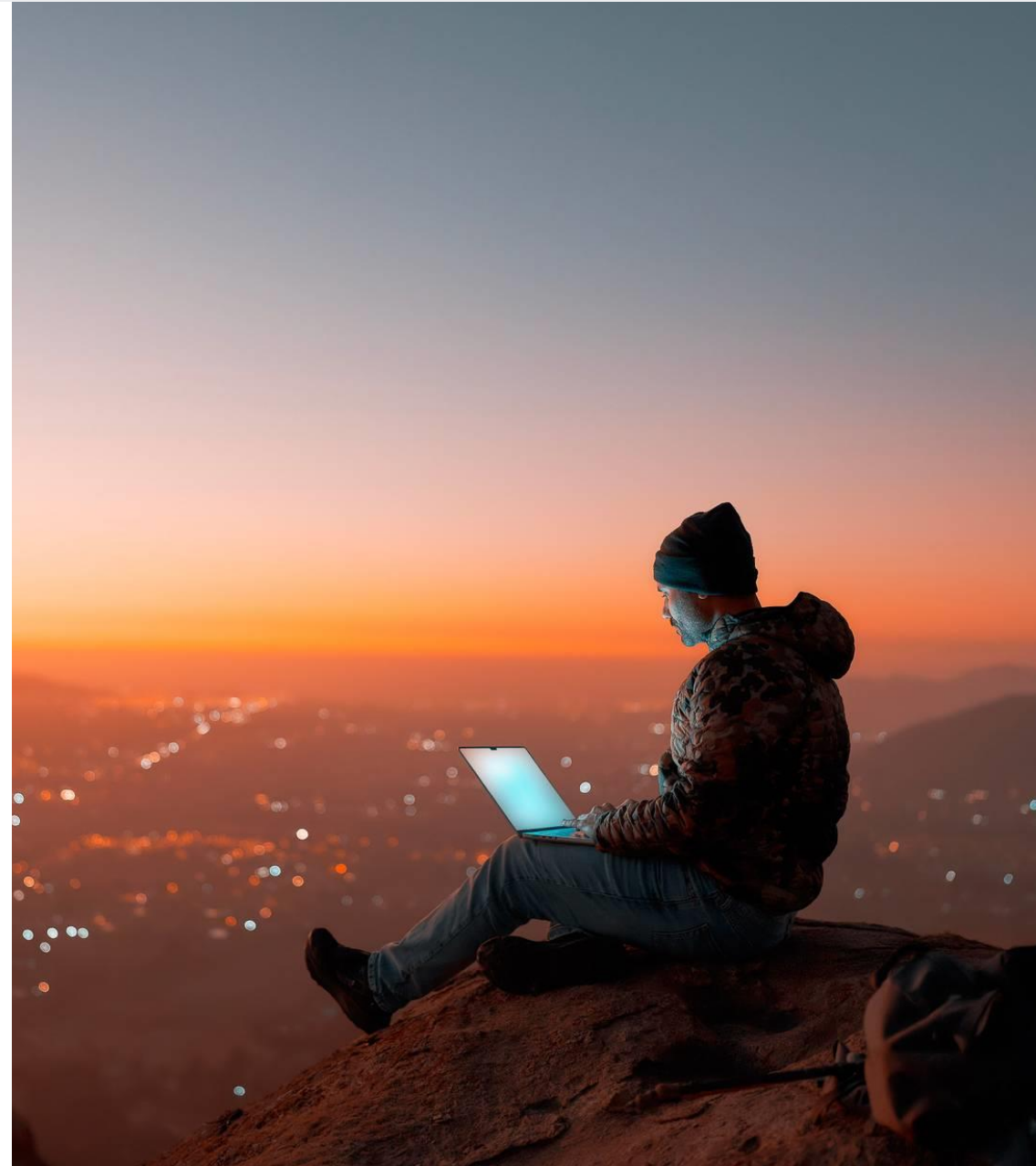
Gifts, entertainment, or other business benefits could be viewed as inappropriate or as potential bribes. Gifts extended to third parties may require additional approvals. Always ensure that gifts are infrequent, of reasonable value, and appropriate for the business context. Please bear in mind that legislation in many countries restricts the value of gifts or invitations that can be extended to public officials. If you are unsure about approval thresholds or whether someone qualifies as a public official or not, please reach out to Legal & Compliance for advice or refer to our Anti-Corruption and Bribery Policy.



We protect our data.

Data protection laws (e.g., GDPR, CCPA, LGPD, PIPL) are in place to ensure that personal data is collected in a compliant manner, stored securely and used only for the purposes for which it was initially collected. Personal data includes any information that identifies (directly or indirectly) an individual (e.g., name, email address, bank details, user ID, IP address). Protecting personal data throughout its entire lifecycle is essential; from the moment it's collected, through secure storage and controlled access, to responsible sharing and safe deletion, each step must ensure and maintain compliance. Personal data should always be considered as confidential and protected accordingly.

Alongside protecting our customers' personal data, safeguarding the personal data of our partners and consultants, as well SoftwareOne's employees' personal data is equally important to us. We are committed to maintaining confidentiality, integrity, availability and security of all personal data, ensuring it is used in compliance with applicable data protection laws.



SoftwareOne Core Values



Integrity

Momentum

Passion

Accountability

Customer-Focus

Trust

To protect personal data, all SoftwareOne employees must:

- Only collect personal data for a defined and documented legitimate business reason.
- Process only the minimum personal data needed for the defined business reason.
- Keep personal data accurate and up-to-date.
- Delete personal data as soon as it is no longer required.
- Ensure personal data is encrypted when transferred or stored.
- Ensure access is limited to those with a legitimate business requirement.
- Anonymize personal data sets where possible.
- Follow all policies and processes applicable to their role.





Integrity

Momentum

Passion

Accountability

Customer-Focus

Trust

Under applicable data protection laws, individuals have rights regarding their personal data. This means, among others, the right to request the deletion of personal data, to halt the processing of personal data or to obtain a copy of the personal data. These requests must be forwarded immediately to the Data Protection team for action.

Everyone (incl. employees, consultants, etc.) must take practical measures to protect personal data. These include securing their work devices by using strong, regularly updated passwords; keeping the software up to date; always locking the screen when stepping away, even for a short moments; only sharing personal data externally when there is a legitimate business need to do so; never leaving company assets containing personal data (e.g., laptops, document cabinets) unattended.

If you notice something wrong (e.g., potential data breach, sharing of personal data with a wrong recipient), it's crucial to act immediately: follow the Personal Data Breach Management Procedure and report it without delay.

If you have questions or need support, contact our Group Data Protection Counsel at data-protection.eu@softwareone.com.

For further guidance, please refer to our Data Protection Policies.

We build trusted partnerships.

We expect employees managing relationships with SoftwareOne partners, suppliers, or other third parties to comply with all contractual and ethical obligations.

Partners and suppliers who meet our integrity, compliance, security, and privacy standards are critical to delivering trusted services to our customers. Employees must require third parties to complete SoftwareOne's compliance onboarding and vetting procedures, respect the outcome, engage responsibly, and ensure partners understand and adhere to our standards. Interactions must be transparent, commercially reasonable, and must uphold ethical business practices. Help maintain the trust in our ecosystem and protect SoftwareOne's reputation.



We are committed to you.

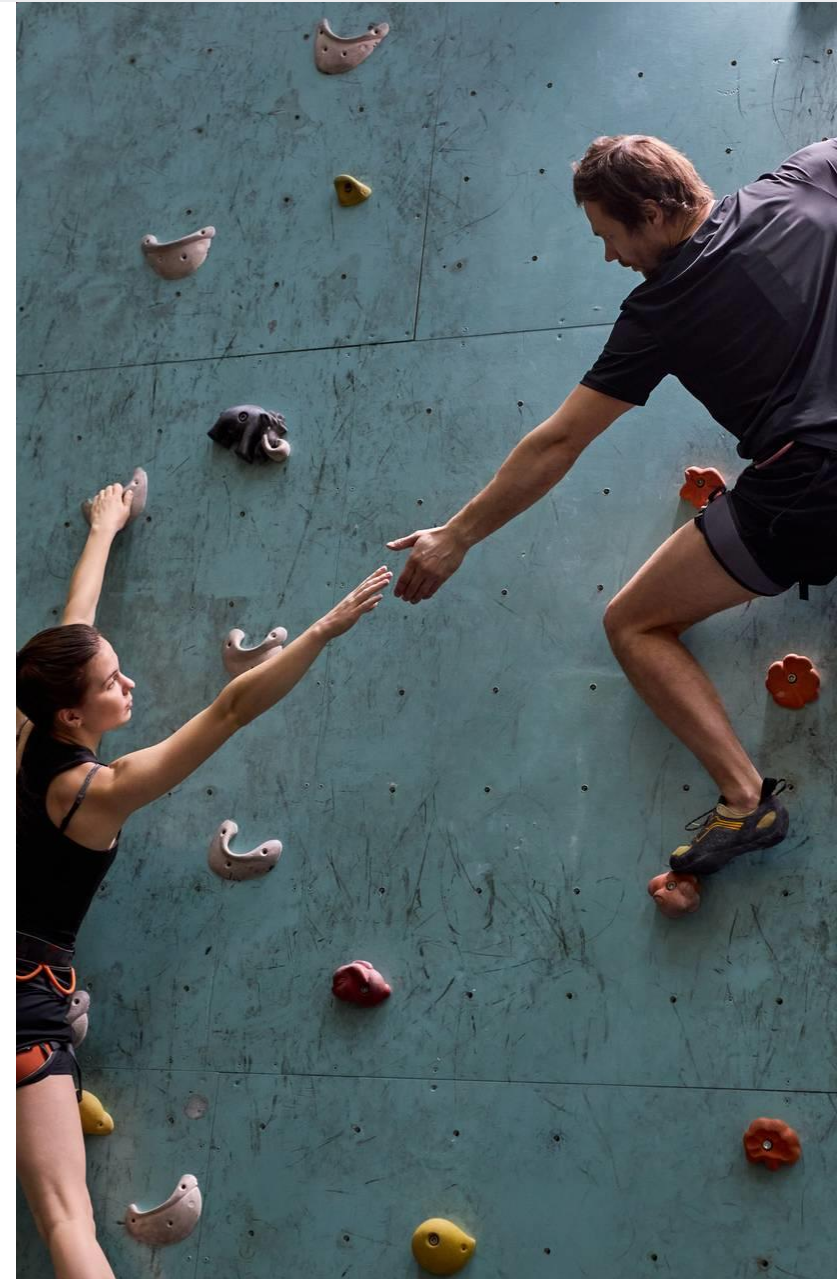
Your labour and human rights are our priority.

Your locally and internationally protected labour and human rights are safe here. SoftwareOne's approach to respecting human rights is based on the United Nations Guiding Principles on Business and Human Rights.

We will provide you with a secure work environment that respects your health and well-being. We are committed to ensuring that child, slave, forced, bonded or compulsory labor is not used. All our employees are free to leave us (provided you give reasonable notice as specified in your contract or as required by national laws).

If your local laws allow, you are free to form or join any trade unions or similar organizations – just as you are free not to join them too – it is up to you! We are also committed to only employing people above the minimum legal age for employment. Internships, apprenticeships or other permitted forms of employment of young people must follow local laws and regulations.

We do business all over the world. We respect the traditions, business customs, social norms, and expectations of our host countries and make every effort to pursue the right course of action. Whilst we welcome diversity of religious beliefs and respect the freedom of every colleague to follow articles of religious faith, we do not pursue any religious convictions, and we request that you do not impose personal beliefs or opinions on others in the workplace.





We treat each other fairly, with respect and dignity at all times.

We do not tolerate harassment and discrimination of any kind. This can look different in different circumstances, but to us this includes physical or verbal abuse, physical or sexual harassment (in any form, including the distribution of sexual materials), any other unlawful harassment or any threats or other forms of intimidation. We strive to examine our unconscious biases and take steps to create an inclusive culture where everyone feels welcome. We always remember to treat people how we would expect to be treated. All kinds of discrimination based on partiality or prejudice are not accepted. This includes discrimination based on gender, race, sex, color, ethnicity, sexual orientation, disability, age, marital status, parental status, pregnancy, religion, political opinion, nationality, indigenous status, social status, union membership and any other characteristic protected by local law as applicable.

To foster respect and inclusion in our workplace, all employees must:

- Speak and act with kindness and professionalism, even in difficult situations
- Report instances of discrimination, harassment, or exclusion to a leader or through appropriate reporting channels
- Listen actively and ensure all voices are heard in discussions and meetings
- Be open to feedback and self-reflection on unconscious bias
- Celebrate and acknowledge cultural and personal differences
- Use inclusive language and respect colleagues' names and pronouns

For further guidance, please refer to our Anti-discrimination and Anti-harassment Policy.



We stand for equal and fair opportunities.

At SoftwareOne, we provide equal opportunities in hiring, benefits, promotions, and professional development, supporting diversity in all its forms, including, but not limited to, gender, age, ethnicity, nationality, and disabilities. All decisions are based on skills and qualifications, and team members are expected to challenge biases, advocating fairness, and support colleagues with reasonable accommodations. Treating everyone - applicants, colleagues, customers, and partners—with respect and fairness is essential. We are committed to continuous learning to enable an inclusive and equitable workplace.

We communicate kindly and responsibly.

Clear, accurate, and appropriate communication is essential to our business. It reflects our values and protects our reputation. We are all responsible for ensuring that how we communicate —written, spoken, or digital—is professional and suitable for the audience and context.

To ensure responsible communication, all employees must:

- Verify facts and accuracy before sharing information
- Use clear and concise language to avoid misunderstandings
- Maintain confidentiality and share sensitive information only with authorised recipients

For further guidance, please refer to our [Company Communication Guidelines](#), [E-mail Guidelines](#) and [Social Media Policy](#).



Integrity

Momentum

Passion

Accountability

Customer-Focus

Trust

We prioritize health and safety.

We ensure a safe and productive working environment for ourselves and our colleagues, adhering to all health and safety regulations, and promoting the well-being of everyone. Each employee is responsible for their actions and must follow safety procedures both in the office and when working remotely. This includes knowing evacuation plans and emergency contacts, participating in drills, reporting incidents, and providing safety guidance to visitors. By staying vigilant and proactive, we create a workplace where all team members can thrive safely.

We give back to our local communities.

We are committed to being responsible corporate citizens and to contribute positively to our communities. We support charitable initiatives (including financial and non-financial donations), and welcome employee participation in volunteer activities. To avoid conflicts of interest and ensure compliance with regulations, donations to our customers are prohibited, as are donations to charities and other organizations suggested or requested by our customers.

For additional information, please refer to our SoftwareOne Gives Back Policy or contact the Global ESG Team.

Enforcement and Responsibility



We provide an annual mandatory Code of Conduct refresher training to ensure all employees understand and uphold our standards. The principles outlined in our Code of Conduct are central to how we work and who we are. Upholding these standards is essential, and violations may result in disciplinary action, including termination of employment in serious cases.

We trust our employees to use common sense, good judgment, and act responsibly, even in situations not explicitly covered by specific policies. Employees are encouraged to report any concerns or potential violations without fear of retaliation. All reports are taken seriously and investigated promptly to maintain a safe and respectful work environment. All persons submitting a report in good faith are protected from retaliation. Speaking up helps us address issues early and provides an environment where everyone can thrive.



Additional Resources

[Anti-Corruption & Bribery Policy](#)

[Conflicts of Interest Policy](#)

[Integrity Line Reporting Policy](#)

[Data Protection and Privacy Policy](#)

[Anti-discrimination and Anti-harassment Policy](#)

[External Reporting Policy](#)

[Internal Regulations Against Insider Trading](#)

[Environmental Policy](#)

[Global Travel Policy](#)

[IT Acceptable Use Policy](#)

Useful Links

[Global Policy Landscape](#)

[Global Legal & Compliance and ESG Hub on SharePoint](#)

Contact Information and Reporting Tools

[Integrity Line](#)

[Disclosure Tool](#)

compliance.global@softwareone.com

Public Official/State-owned entity employee	Any national, provincial, regional or local legislative, administrative, or judicial body, including any state funded organizations, such as schools, universities, healthcare facilities, police agencies, military entities, issuers of government permits, approvals or licenses, etc. Any state-owned enterprises (SOE) and/or state instrumentalities (an entity for which there is control by the government and the entity is performing a governmental function) or public (quasi-governmental) international organizations (such as the United Nations, International Monetary Fund, African Union, etc.).
Third Party	Any entity or individual not affiliated with SoftwareOne, including customers, partners, publishers, suppliers and vendors.
Bribe	Giving or offering to give, directly or indirectly, anything of value for the purpose of obtaining or retaining business, to secure an improper advantage of any kind, or to otherwise attempt to influence a decision regarding SoftwareOne.
Gifts & Invitations	Anything of value or any form of benefit, which includes, but is not limited to, cash, tangible items, offers, favorable terms or promises, entertainment or free tickets, use of SoftwareOne services or products and donations or sponsorships.
Material Non-Public Information	Non-public information that would be reasonably likely to affect an investor's decision to buy, sell, or hold the securities of a company.
Personal Data	Any information that is directly or indirectly linked to an individual (e.g., name, identification number, location data, online identifier, etc.). As this covers any type of information, and because there is no finite list of types of information that represent personal data, the relevant consideration is whether the data is linked to an identified or identifiable individual or whether the data itself can single out an individual.



Thank you

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